

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF)	
KENTUCKY UTILITIES COMPANY FOR)	
AUTHORIZATION OF CHANGES IN)	
SERVICE TERRITORY WITH FARMERS)	CASE NO. 2020-00135
RURAL ELECTRIC COOPERATIVE)	
CORPORATION)	

RESPONSE OF
KENTUCKY UTILITIES COMPANY
TO COMMISSION STAFF'S INITIAL REQUEST FOR INFORMATION
DATED JUNE 5, 2020

FILED: JUNE 19, 2020

**Kentucky Utilities Company
Response to Commission Staff's Initial Request for Information
Dated June 5, 2020**

Case No. 2020-00135

Question No. 1

Witness: Donna M. Goodrich

- Q-1. Refer to the application, page 2, and Exhibit 1. Confirm that the trailer home located at 475 Guthrie Street is the property owner's residence.
- A-1. Odell Robertson is one of the owners of record of 475 Guthrie Street and is the individual with whom Farmers RECC ("Farmers") and Kentucky Utilities Company ("KU") have been in communication regarding the requested new service at the trailer home located on the property. The trailer home is not Mr. Robertson's residence. The trailer home is occupied by tenants and has a separate mailing address of 463 Guthrie Street.

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Question No. 2

Witness: Donna M. Goodrich

- Q-2. Refer to the application, page 2, and Exhibit 1. Provide documentation showing that the property owner has consented to the change in electric service provider.
- A-2. The main residence at 475 Guthrie Street is already served by Farmers. KU does not propose any change in service provider there.

Mr. Robertson initially reached out to Farmers to obtain new service for the tenants' location at 463 Guthrie Street, which is the subject of the requested territorial change. Because the tenants' trailer home is currently located inside KU's territorial boundaries, Farmers and Mr. Robertson contacted KU about KU providing service to the trailer home. KU does not have existing facilities to serve this particular property. While it is in KU's service territory, KU had not provided prior service to any customer there.

Due to the limited amount of road right-of-way, a cemetery on the east side of Guthrie Street and the unwillingness of neighboring property owners to grant easements, KU was unable to provide service to the trailer home, without significant cost being borne by the property owner for new infrastructure necessary to serve the trailer home. Thus, KU contacted Farmers and proposed moving the territorial boundary so that Farmers could serve the trailer home. Given Farmers' existing infrastructure in the vicinity, Farmers could provide the requested service more easily than KU and without burdening the property owner with significant expense.

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Question No. 3

Witness: Donna M. Goodrich

- Q-3. Refer to the application, page 2, and Exhibit 1. Provide documentation that the property owner is aware of the differences in KU's and Farmers Rural Electric Cooperative Corporation's (Farmers RECC) electric service rates and the likely differences in monthly bills.
- A-3. KU is not aware of any documented discussions with the property owner as to the differences in rates between KU and Farmers. Mr. Robertson owns properties on Guthrie Street in both Farmers' and KU's service territories with active accounts and therefore is likely aware of the differences in rates.

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Question No. 4

Witness: Donna M. Goodrich

- Q-4. Refer to the application, Exhibit 1 maps at 10–11.
- a. It is not clear where the property highlighted on the detailed site map on page 11 is situated in the quadrant map on page 10. Provide the appropriate detail. Include an arrow with the case number pointing to the adjusted boundary. Submit this map as a separate PDF file so that the quality of the image is not degraded by becoming pixelated.
 - b. The detailed site map on page 11 with the existing electric service area boundary in yellow and the boundary changes is sufficient, except the northings and eastings are illegible in the submission. Resubmit this map as a separate PDF file so that the quality of the image is not degraded by becoming pixelated.
 - c. Make a new detailed site map of the area showing the existing electric service area boundary, the mobile home at 475 Guthrie Street, property lines for the area, and existing Farmers RECC and KU electric lines in order to illustrate the difficulties encountered by KU that led to the request of Farmers RECC to serve the customer. Show the route that will be utilized by Farmers RECC to serve the customer. (This map does not need to be signed and dated by both parties.) Submit this map as a separate PDF file.
- A-4.
- a. See Attachment – Revised Quadrant Map
 - b. See Attachment – Site Map

The five GPS coordinates are as follows:

	Northing	Easting
Point 1	1951295.32	1596269.84
Point 2	1950984.74	1596163.90
Point 3	1951082.48	1595909.91
Point 4	1951370.44	1596008.13
Point 5	1951359.97	1596074.81

c. See Attachment – Revised Site Map

The attachments are
being provided in
separate files.