

**COMMONWEALTH OF KENTUCKY**  
**BEFORE THE PUBLIC SERVICE COMMISSION**

**In the Matter of:**

<b>ELECTRONIC APPLICATION OF</b>	)	
<b>KENTUCKY UTILITIES COMPANY FOR</b>	)	
<b>AUTHORIZATION OF CHANGES IN</b>	)	
<b>SERVICE TERRITORY WITH CLARK</b>	)	<b>CASE NO. 2020-00319</b>
<b>ENERGY COOPERATIVE, INC.</b>	)	

**RESPONSE OF**  
**KENTUCKY UTILITIES COMPANY**  
**TO COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION**  
**DATED JANUARY 5, 2021**

**FILED: JANUARY 19, 2021**

**VERIFICATION**

**COMMONWEALTH OF KENTUCKY )**

**COUNTY OF MADISON )**

The undersigned, **Michael Woods**, being duly sworn, deposes and says that he is Manager, Operations Center for Kentucky Utilities Company and an employee of Kentucky Utilities Company, and that he has personal knowledge of the matters set forth in the responses for which he is identified as the witness, and the answers contained therein are true and correct to the best of his information, knowledge and belief.

  
\_\_\_\_\_  
Michael Woods

Subscribed and sworn to before me, a Notary Public in and before said County and State, this 19<sup>th</sup> day of January 2021.

  
\_\_\_\_\_  
Notary Public

Notary Public ID No. 603967

My Commission Expires:

July 11, 2022

**Kentucky Utilities Company**  
**Response to Commission Staff's First Request for Information**  
**Dated January 5, 2021**

**Case No. 2020-00319**

**Question No. 1**

**Witness: Michael Woods**

Q-1. In the January 31, 2005 final Order for Case No. 2004-00382,<sup>2</sup> the Commission ordered that KU file the following:

A copy of the Fieldstone Estates Subdivision map reflecting the agreed-upon amended territorial boundary in Phase 1 shall be attached to the Commission's official territorial boundary map identified as the Richmond North USGS Topo Map.

The northings and eastings for the proposed service boundary on that map agree with the ones in the written agreement submitted as part of Case 2004-00382. A copy of the map from Case No. 2004-00382 is attached as Appendix A with this request for information. There are some northings and eastings on the map that define the existing service area boundary. This is a more exact definition of the existing service area boundary than one on the 1:24,000 Richmond North USGS Topo Map quadrant map signed in 1995; therefore, this is the definition of the existing electric service area boundary that should be used for this proceeding. As illustrated in the attached map in Appendix B, Magnolia Pointe is located along the northern part of the existing line and Ash Park begins along the southern part of the line defined by Case No. 2004-00382. Confirm that the existing electric service area boundary is the one defined in map filed in Case No. 2004-00382.

A-1. Yes. KU and Clark confirm that the existing electric service area boundary is the one defined in the map filed in Case No. 2004-00382.

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<sup>2</sup> Case No. 2004-00382, Application of Clark Energy Cooperative, Inc. to Amend Service Territory With Kentucky Utilities Company at Fieldstone Estates Subdivision (Ky. PSC Jan. 31, 2005)

**Kentucky Utilities Company  
Response to Commission Staff's First Request for Information**

**Dated January 5, 2021**

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**Question No. 2**

**Witness: Michael Woods**

- Q-2. Provide a new map and new coordinates for Magnolia Pointe that incorporate the existing service area boundary from Case No. 2004-00382 that is signed and dated by both companies.
- A-2. See attached.

The attachment is  
being provided in a  
separate file.

**Kentucky Utilities Company  
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**Question No. 3**

**Witness: Michael Woods**

- Q-3. Provide a new map and new coordinates for Ash Park that incorporate the existing service area boundary from Case No. 2004-00382 that is signed and dated by both companies.
- A-3. See attached.

The attachment is  
being provided in a  
separate file.

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**Case No. 2020-00319**

**Question No. 4**

**Witness: Michael Woods**

- Q-4. If the description of the boundaries for Magnolia Pointe or Ash Park change in terms of the lots involved, revise the description.
- A-4. The Ash Park Subdivision, located off Four Mile Road (including Windward Way and The Beacon) in Madison County, Kentucky crosses both KU and Clark Energy service territories. The developer's current phase established property lines for 192 individual lots when the land was subdivided, thus causing 16 "split" territories. KU and Clark Energy agree to redraw the certified territorial boundary to match the existing individual property lines and to effectively extend existing company facilities. This agreement eliminates the split territory issue with lot #'s 6, 9-17, 86-90, and 113. As indicated on the site map, KU will serve lot #'s 6, 9-11, 86-90, 113. Clark Energy will serve lot #'s 12-17.

The Magnolia Pointe Subdivision, located off Ryan Drive (including Copley Pointe Drive and a future named road) in Madison County, Kentucky crosses both KU and Clark Energy service territories. The developer's current phase established property lines for 166 individual lots when the land was subdivided, thus causing 12 "split" territories and 15 affected properties. KU and Clark Energy agree to redraw the certified territorial boundary to match the existing individual property lines and to effectively extend existing company facilities. This agreement eliminates the split territory issue with lot #'s 9-11, 29, 30, 43, 44, 100, 101, 128, 129, 158. As indicated on the site map, KU will serve lot #'s 9 and 10. Clark Energy will serve lot #'s 11, 29, 30, 43, 44, 100-102, 128, 129, 158-160.