

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) CASE NO. 2021-00138
WITH BLUE GRASS ENERGY COOPERATIVE)
CORPORATION)**

**RESPONSE OF
KENTUCKY UTILITIES COMPANY
TO
COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
DATED APRIL 13, 2021**

FILED: APRIL 27, 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 26 day of April 2021.



Notary Public

Notary Public ID No. 003967

My Commission Expires:

July 11, 2022

KENTUCKY UTILITIES COMPANY

**Response to Commission Staff's First Request for Information
Dated April 13, 2021**

Case No. 2021-00138

Question No. 1

Responding Witness: Michael Woods

- Q-1. Refer to the Application, Section 6, Agreement and Maps. Provide a map that shows the existing KU and Blue Grass Energy Cooperative Corporation (Blue Grass Energy) distribution facilities and the location of the proposed Blue Grass Energy line to the Northern residence and the alternative KU line. Submit this map on paper as well as sending a scanned PDF copy.
- A-1. See attached map of KU and Blue Grass Energy distribution facilities.

Upon review of the signed site map, it was determined that the line indicated as "Existing Territorial Line" did not correspond with the official KU Service Territory Boundary on the Richmond North Quadrangle map as filed with the Public Service Commission. A correction was made to indicate the official boundary. The proposed adjustment to the territory boundary was subsequently updated to reflect this correction. Specifically point A was adjusted to the location where the original proposed change crossed the official boundary at $37^{\circ} 50' 34.23''\text{N } 84^{\circ} 21' 21.27''\text{W}$ and the line between the original points B and C was extended directly to the southwest for approximately 52 ft. to meet the boundary at $37^{\circ} 50' 23.7''\text{N } 84^{\circ} 21' 31.56''\text{W}$. See attached signed revised site map notated as REVISION 04-20-21 that replaces the original filed site map in this case.

The attachment Map of KU and
Blue Grass Distribution
Facilities is being provided in a
separate file

The attachment KU and Blue
Grass Revised Site Map is
being provided in a separate file

KENTUCKY UTILITIES COMPANY

**Response to Commission Staff's First Request for Information
Dated April 13, 2021**

Case No. 2021-00138

Question No. 2

Responding Witness: Michael Woods

- Q-2. Refer to the Application, Section 5, Description of Changes in Service Territory.
- a. Provide a cost estimate of the new electric distribution facilities required of Blue Grass Energy versus KU's required facilities to serve the Northern residence.
 - b. Provide a detailed explanation of how the project extending Blue Grass Energy's distribution line by approximately 950 feet will be funded.

A-2.

- a. KU cost estimate:

Extension cost above 1,000 feet:	\$23,000
Tree trimming:	\$50,000
Easement expense:	Unable to determine at this time
Total estimate:	\$73,000 +

Blue Grass Energy estimate:

Total estimate:	\$10,202.38
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- b. Blue Grass Energy Response: As the project will extend less than 1,000 feet from existing Blue Grass Energy Facilities, the project shall be funded in accordance with standard practices pursuant to compliance with section 38, Distribution Line Extensions, subsection a. of the Kentucky PSC Rules and Regulations. Quoted herein as "An extension to a permanent residence of one thousand (1,000) feet or less shall be made by Blue Grass Energy to its existing distribution line without charge for a prospective member who shall apply for and agree to use the service for one year or more and provides guarantee for such service." This project meets these requirements.

KENTUCKY UTILITIES COMPANY

Response to Commission Staff's First Request for Information Dated April 13, 2021

Case No. 2021-00138

Question No. 3

Responding Witness: Michael Woods

- Q-3. Provide all correspondence with Mr. David Northern concerning the provision of electrical service to his property located at 420 Whitehall Shrine Road, Richmond, Kentucky.
- A-3. KU: KU communication consisted of one telephone conversation with Mr. Northern. The conversation discussed Mr. Northern's electric requirements for a new home that he was planning to construct within KU's certified electric service territory. KU informed Mr. Northern that it was happy to provide service, however his contribution would be tens of thousands of dollars due to the extension distance, as well as the tree clearing and easements required. KU learned that Blue Grass was already providing electric service to Mr. Northern's barn, which is located wholly within Blue Grass' certified electric service territory. Due to the existing Blue Grass distribution facilities, KU informed Mr. Northern that his expense would be much less to have Blue Grass provide service rather than for KU to provide service.

Blue Grass Energy Response: Blue Grass Energy met with Mr. Northern near the end of 2020 and informed him that KU would need to provide permission and the acceptable documentation for Blue Grass Energy to provide electrical facilities to the permanent residence being constructed in existing KU service territory. Mr. Northern contacted KU and sought their input on this subject. KU and Blue Grass Energy subsequently communicated with one another through email and telephone to move through the boundary adjustment process.