DATA REQUEST

KPSC 1_1 Explain and provide documentation that shows the method each of the three customers contacted Kentucky Power to request to change electric service from Big Sandy Rural Electric Cooperative Corporation (Big Sandy R.E.C.C.) to Kentucky Power.

RESPONSE

Ms. Tackett and Ms. Keeton each contacted the Kentucky Public Service Commission's Consumer Services Division on February 22, 2021 to file an informal inquiry. Both consumers stated they lived within Kentucky Power's service territory and requested electric service to be provided by Kentucky Power. Please see KPCO_R_KPSC_1_1_Attachment1 for a copy of these inquiries.

Ms. Maynard, after speaking with her neighbors, contacted the local Kentucky Power Customer Services Account Representative on April 30, 2021 requesting that Kentucky Power provide her electric service. Please see KPCO_R_KPSC_1_1_Attachment2 for the email communication between the Company and Ms. Maynard.

KPSC Case No. 2021-00334 Commission Staff's First Set of Data Requests Dated September 17, 2021 Item No. 1 Attachment 1 Page 1 of 2 2/22/2021

PSC Co	onsumer	Inquiry	System
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Complaint:	2021-00409	Entry Date:	2/22/2021	Closed Date:		Contact Type:	Hotline
Name:	Tackett, Mar	ie Adams		Utility:	Kentucky Powe	r Company	
Address:	204 Preston			Utility Nbr:	300	Location:	Residence
	Meally, KY 4	41234		Utility Type:	Investor-		
County:	Johnson			Reason:	Rates/Policies (Other)	
Home: (606)) 369-3549 V	Nork:			(none) ((none)	. ,	
Fax:	C	CBR Nbr:		Complaint ref	erred by:		
Cell:	E	Email:					
Contacted Uti	ility? 🖌	Spoke with:	Customer Servi	ice			
		Cust Relations	Good Response	е			
Utility Contact:	stevi Cobern	I		Contact's	(606) 327-2618		
Preliminary De Wants to be se	•	ucky Power		Other Contacts	:		
Processor:	CAROLJ						
See File		Case Related		Staff Referral		Confidential	
Info Only		Formal Forms	s	Ref to Util		Customer Satisfied	Yes () No ()

PSC Narratives:

Investigator: CAROLJ

Date: 2/22/2021 9:41:08 AM

Customer wants her service provider to be Kentucky Power. She said she is within Kentucky Power's boundary and Kentucky Power has confirmed this to her. Customer has lived at the above address for 20 years, and her service has been provided by Big Sandy RECC the entire time she has lived there. She says everybody up the road has Kentucky Power. Her power goes over two hills now, but if it was provided by Kentucky Power it would come in a straight line. She said Big Sandy agreed she is in Kentucky Power's service territory. She did not know why Big Sandy provided the service over 20 years ago if she was in Kentucky Power's territory.

She now wants to disconnect her Big Sandy RECC service and have Kentucky Power provide her service. Both companies told her to call the PSC to approve the change from Big Sandy RECC to Kentucky Power. She said Big Sandy is willing to give her up and Kentucky Power is ready to serve her.

Advised customer that normally boundary issues are settled when service is initially installed. Since she has active service for over 20 years, the cost to install service to her will most likely be borne by her. I asked why this is coming up now if she knew she was in the wrong boundary 20 years ago. At that point I learned her power is currently out, but the Kentucky Power customers have service. She said her electric service has been off for 14 days.

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PSC Consumer Inquiry System

Complaint:	2021-00411	Entry Date:	2/22/2021	Closed Date:		Contact Type:	Hotline
Name:	Keeton, Sav	vanna		Utility:	Kentucky Powe	r Company	
Address:	191 Prestor			Utility Nbr:	300	Location:	Residence
	Meally, KY	41234		Utility Type:	Investor-		
County:	Johnson			Reason:	Rates/Policies (Other)	
Home: (606)) 776-3770	Work:			(none) ((none)		
Fax:		CBR Nbr:		Complaint ref	erred by:		
Cell:		Email:					
Contacted Ut	ility? 🖌	Spoke with:	Customer Servi	се			
		Cust Relations	Failed To Corre	ct Problem			
Utility Contact:	stevi Coberr	n		Contact's	(606) 327-2618		
Preliminary De Wants to be se	•	tucky Power		Other Contacts	::		
Processor:	CAROLJ						
See File		Case Related		Staff Referral		Confidential	
Info Only		Formal Forms	s	Ref to Util		Customer Satisfied	Yes O No O

PSC Narratives:

Investigator: CAROLJ

Date: 2/22/2021 9:55:33 AM

Customer wants her service provider to be Kentucky Power. She said she is well within Kentucky Power's boundary per the maps she found online. She has 12 acres. Kentucky Power wouldn't tell her one way or the other whether she was in their service territory. Customer has lived at the above address for 5 years, but the house is 20 years old. The service has been provided by Big Sandy RECC the entire time. She says everybody up the road has Kentucky Power including her neighbor across the street. Her power goes over two hills now, but if it was provided by Kentucky Power it would come in a straight line.

She now wants to disconnect her Big Sandy RECC service and have Kentucky Power provide her service. Both companies told her to call the PSC to approve the change from Big Sandy RECC to Kentucky Power. Neither company will tell her whose territory she belongs in. Since Big Sandy didn't deny it, she assumes she is in Kentucky Power's territory.

Advised customer that normally boundary issues are settled when service is initially installed. Since there has been active service for over 20 years, the cost to install service to her will most likely be borne by her. She said she will gladly pay whatever it cost. I asked why this is coming up now if she knew she was in the wrong boundary years ago. She said her electric service is off due to the winter storm. She said every time it rains, her power flickers. The Kentucky Power customers have service.

KPSC Case No. 2021-00334 Commission Staff's First Set of Data Requests Dated September 17, 2021 Item No. 1 Attachment 2 Page 1 of 1

From: Vineta Maynard <<u>vmaynard@me.com</u>>
Sent: Friday, April 30, 2021 5:26 PM
To: Linda J Bevins <<u>libevins@aep.com</u>>
Subject: [EXTERNAL] Re: Vineta Maynard Phone 606-205-7437

This is an **EXTERNAL** email. **STOP**. **THINK** before you CLICK links or OPEN attachments. If suspicious please click the '**Report to Incidents**' button in Outlook or forward to <u>incidents@aep.com</u> from a mobile device.

I would very much like for my power service at 192 Prestons Branch Meally to be transferred to AEP from Big Sandy RECC. I attempted this request 3 years back and was unsuccessful.

Thank you Vineta Maynard Realtor 304-972-3668 call 606-205-7437 text vmaynard @me.com Realestateandrealestate.com

On Apr 30, 2021, at 4:30 PM, Linda J Bevins <<u>libevins@aep.com</u>> wrote:

Good Afternoon Ms. Maynard, As a follow up to our earlier conversation on 4/30/21 at approx. 4:20PM-it is my understanding you are requesting your electric service located at 192 Preston Branch, transferred from RECC to KY Power. Please respond to this email and send back to me at your earliest convenience.

Thank You,

<image001.png> LINDA J BEVINS | CUST SVCS ACCT REP SR LJBEVINS@AEP.COM | D:606.437.3109 3249 NORTH MAYO TRAIL, PIKEVILLE, KY 41501

DATA REQUEST

KPSC 1_2 State the reasons Kentucky Power was given as to why each of the three customers are requesting to change electrical service from Big Sandy R.E.C.C. to Kentucky Power.

RESPONSE

Ms. Tackett and Ms. Keeton indicated their desire to change providers stemmed from an extended power outage due to a winter ice storm. At the time of their requests both customers had been without service for approximately two weeks; however, their nearby neighbors served by Kentucky Power had service.

Ms. Maynard stated her request to change providers was due to unsatisfactory service and outages.

DATA REQUEST

KPSC 1_3 State the difference in rates that Kentucky Power will charge the three customers as compared to the rates the three customers have been paying to Big Sandy R.E.C.C.

RESPONSE

Please see KPCO_R_KPSC_1_3_Attachment1 for a comparison of the rates between Kentucky Power and Big Sandy RECC for September 2021 billing. Riders may change periodically. The Company's Federal Tax Cut rider adjusts seasonally and is designed to provide a higher credit to residential customers during the months of December through March.

DATA REQUEST

KPSC 1_4 Explain in detail any alternatives to the proposed agreement that were considered by Kentucky Power and Big Sandy R.E.C.C.

RESPONSE

Please see the Company's response to KPSC 1_1. Upon learning of the customers' interest in Kentucky Power, the Company investigated whether the service locations were within the Company's certified territory and ultimately confirmed that they are. The Company also studied the engineering requirements and costs associated with extending its distribution lines to serve these customers. Finally, the Company contacted Big Sandy RECC management to discuss Kentucky Power serving the customers. The result of these conversations was the proposed agreement.

DATA REQUEST

KPSC 1_5 Estimate how long it will take for Kentucky Power to provide retail electric service to the three customers after gaining approval from the Commission.

RESPONSE

The Company estimates that it will take 10-12 weeks to provide service to the three customers after gaining approval from the Commission. This estimate is based on the following:

Milestone	Est. Timeframe to Complete
Complete design and assign work order	2 Days
Right of way easements acquired	4 Weeks
Cut right of way	4-6 Weeks
Complete field work (install six poles, work two existing poles, and install services)	2 Weeks
Total	10-12 Weeks

DATA REQUEST

KPSC 1_6 Submit the map documents that define the electric service area boundary line between Big Sandy R.E.C.C. and Kentucky Power in the area of Prestons Branch Road.

RESPONSE

Please see KPCO_R_KPSC_1_6_Attachment1. The attachment contains the certified territory maps (1982 and 1991) maintained by the Commission pursuant to KRS 278.017(2). The maps were obtained by the Company through an open records request. The maps show the electric service area boundary between Big Sandy RECC and Kentucky Power in the area of Prestons Branch Road (the area in question).

KPSC Case No. 2021-00334 Commission Staff's First Set of Data Requests Dated September 17, 2021 Item No. 6 Attachment 1 Page 1 of 8



Andy Beshear Governor

Rebecca W. Goodman Secretary Energy and Environment Cabinet Commonwealth of Kentucky **Public Service Commission** 211 Sower Blvd. P.O. Box 615 Frankfort, Kentucky 40602-0615 Telephone: (502) 564-3940 Fax: (502) 564-3460 psc.ky.gov

April 27, 2021

ORR Log # 2021-026

Michael J. Schmitt Chairman

Kent A. Chandler Vice Chairman

Talina R. Mathews Commissioner

TRANSMITTED VIA E- MAIL

Stites & Harbison, PLLC Attention: Mark R. Overstreet 421 West Main Street P.O. Box 634 Frankfort, Kentucky 40602-0634 <u>moverstreet@stites.com</u>

Re: Open Records Request received April 19, 2021 requesting territory maps for Preston Branch in Johnson County, Kentucky PSC Reference: ORR # 2021-026

Dear Mr. Overstreet:

Pursuant to your request for records, a copy of which is attached hereto for reference purposes, I have attached four PDF files containing territory maps for Quadrangles 37-F-4 and 38-F-3, located in Johnson County, Kentucky. There are two maps available for each quad: a color map dated 1982 by Kentucky Power and the PSC and signed by both utilities, and a blueprint dated 1991 by the PSC (signed but not dated by the utilities) on an old (1962/1954) base map. These are the legal documents that the PSC has for the electric service areas.

It is important to take into account the old technology ... the 1982 electric service area boundaries on the color map were most likely made by tracing a previous map over a light table; the 1982 maps were digitized by the PSC in 1998 using a digitizing table (not a scanned image that can be enlarged on a monitor as is done today). Generally, the quad maps are only accurate to within + or - 100 feet. Notice that the electric service area boundaries did not match at the quadrangle edges, so the PSC added a short line. It appears that the maps that were submitted in 1991 were in response to the missing electric service area boundary in the upper right hand corner of the 1982 Offutt quad, and that line alone was digitized from the blueprint maps in 1998. The digital lines for the electric service areas have no legal standing.

KentuckyUnbridledSpirit.com



KPSC Case No. 2021-00334 Commission Staff's First Set of Data Requests Dated September 17, 2021 Item No. 6 Attachment 1 Page 2 of 8

Mr. Overstreet April 27, 2021 Page 2

ORR Log # 2021-026

If you have any questions, please do not hesitate to contact Kathy Gillum at (502) 782-2583, or via e-mail.

Sincerely,

ndwell

Linda C. Bridwell, P.E. Executive Director

kg

Attachments: PDF files (Maps)

KPSC Case No. 2021-00334 Commission Staff's First Set of Data Requests Dated September 17, 2021 Item No. 6 Attachment 1 Page 3 of 8

RECEIVED ORR Log # 2021-026 APR 19 2021

COMMONWEALTH OF KENTUCKY

REQUEST TO INSPECT PUBLIC RECORDS RE KRS CH. 61 PUBLIC SERVICE COMMISSION

To: Kentucky Public Service Commission P.O. Box 615 Frankfort, KY 40601

(or fax to 502-564-3460) OR E-Mail to: PSC-ORA_Custodian@Ky.Gov

All e-mailed requests MUST be sent to the above e-mail address for processing

I request to inspect the following document(s):

Please see the attached.

(Provide Case Number, if Applicable)

Date: April 19, 2021

EQUESTOR INFORMATION (MUST I	BE COMPLETED FOR PSC	RECORDS)				
Mark R. Overstreet S		Stites & Harbison PLLC	Stites & Harbison PLLC			
Name		Company Name (if applicable)	Company Name (if applicable)			
P.O. Box 634		×				
Mailing Address						
Frankfort	KY	United States	40602-0634			
City	State	Country	Zip Code			
(502) 223-3477	moverstre	et@stites.com				
Phone Number	E-Mail Address					
Mail Records to me (Bill sent with Re	cords)	THIS SECTION FOR USE BY PSC ST	TAFF ONLY			
Select Delivery Method		Copies	@ \$0.10 each = \$			
PLEASE ENSURE THAT ALL INFOR COMPLETELY, PRINT, SIGN, AND		DVD's -	_@ \$10.00 each = \$			
MAILING ADDRESS, E-MAIL ADDRI	ESS, OR FAX NUMBER		@ \$6.00 each = \$			
LISTED AT THE TOP OF THIS FOR		Shipp	ing Material Cost = \$			
1 lou K	CETT.	Cash	Postage = \$			
Signature			OTAL BILLED = \$			

KPSC Case No. 2021-00334 Commission Staff's First Set of Data Requests Dated September 17, 2021 Item No. 6 Attachment 1 Page 4 of 8

STITES & HARBISON PLLC

ATTORNEYS

ORR Log # 2021-026

421 West Main Street P.O. Box 634 Frankfort, KY 40602-0634 (502) 223-3477

Mark R. Overstreet (502) 209-1219 moverstreet@stites.com

April 19, 2021

Open Records Act Custodian Public Service Commission of Kentucky 211 Sower Boulevard P.O. Box 615 Frankfort, KY 40602-0615

RE: **Open Records Request for Certified Territory Map**

Dear Madam or Sir:

KRS 278.017(2) provides that the Public Service Commission "will prepare or cause to be prepared" a map of the boundaries of the certified territories of each retail electric supplier in the Commonwealth. This is a request for the certified territory map or maps in the records of the Commission that include the boundary between Kentucky Power Company and Big Sandy Rural Electric Corporation in and about the area of 144 Preston Branch Road, 191 Preston Branch Road, 192 Preston Branch Road, and 204 Preston Branch Road, Meally, in Johnson County, Kentucky.

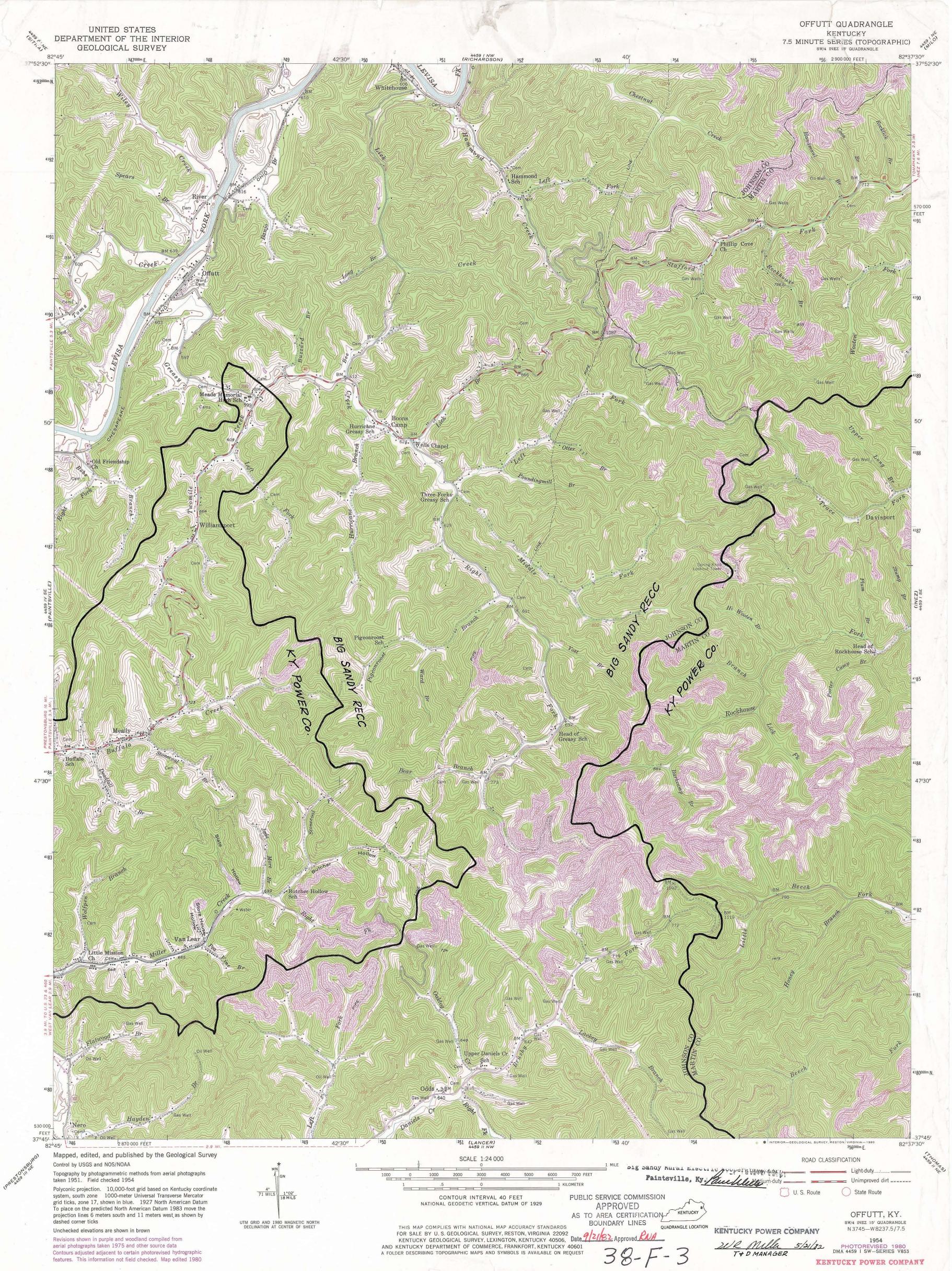
I request a digital copy of the map if available. I will reimburse the Commission for all reasonable costs.

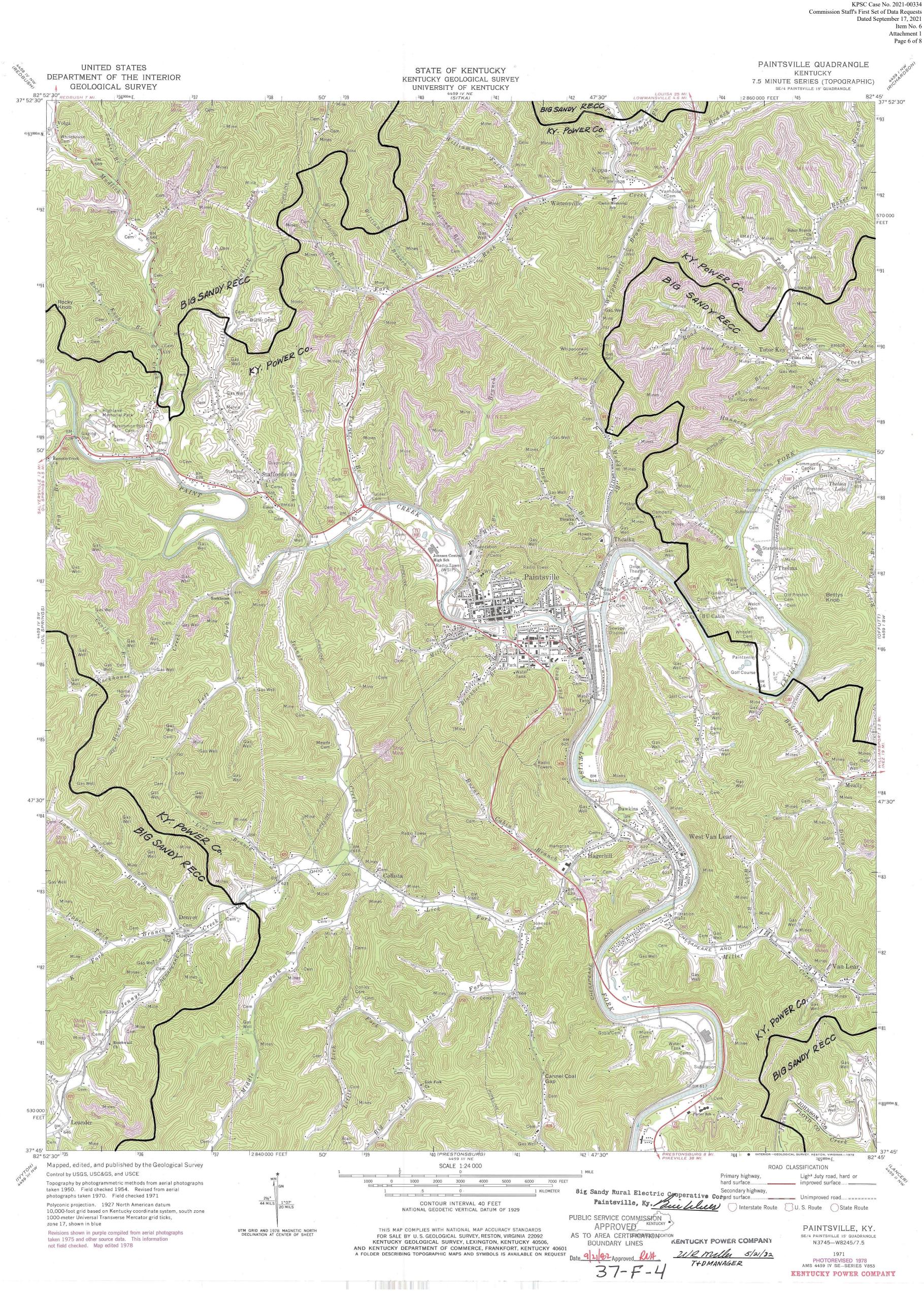
Please do not hesitate to contact me if you have any questions.

Very truly yours, STITES & HARBISON PLLO

Mark R. Overstreet

MRO







KPSC Case No. 2021-00334

zone 17. shown in blue

Fine red dashed lines indicate selected fence and field lines where UTM GRID AND 1962 MAGNETIC NORTH DECLINATION AT CENTER OF SHEET generally visible on aerial photographs. This information is unchecked

THIS MAP COMPLIES WITH NATIONAL MAP ACCURACY STANDARDS FOR SALE BY U. S. GEOLOGICAL SURVEY, WASHINGTON 25, D. C., BY d. M. Lucord KENTLICKY POWER FOR SALE BY U. S. GEOLOGICAL SURVEY, WASHINGTON 25, D. C., KENTUCKY GEOLOGICAL SURVEY, LEXINGTON, KENTUCKY, AND KENTUCKY DEPARTMENT OF COMMERCE, FRANKFORT, KENTUCKY A FOLDER DESCRIBING TOPOGRAPHIC MAPS AND SYMBOLS IS AVAILABLE ON REQUEST

BY/Jul

BIG SANDY RECC

felle

SE/4 PAINTSVILLE 15' QUADRANGLE

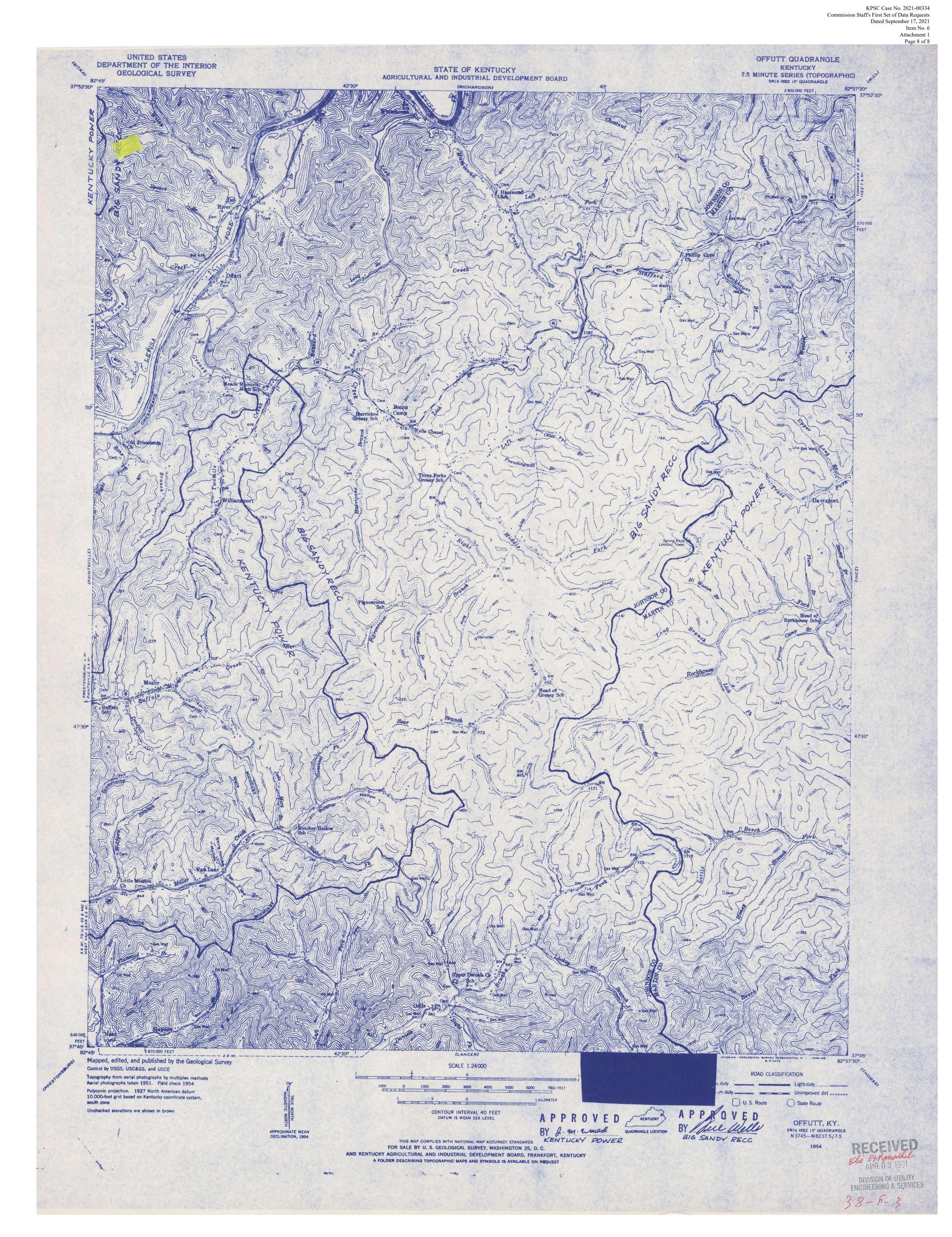
N3745-W8245/7 5

1962 AMS 4459 IV SE-SERIES V853 RECEIVED

Elie Ef-Romaihel APR 0 3 1991

DIVISION OF UTILITY ENGINEERING & SERVICES

37-1-4

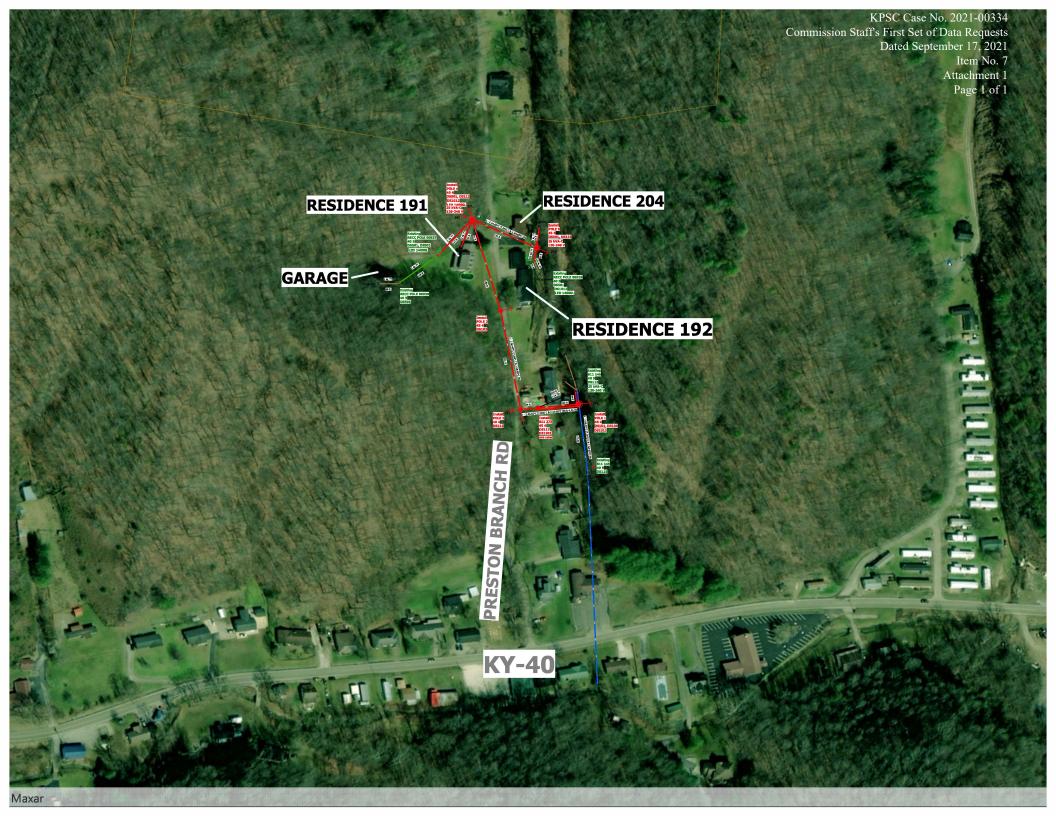


DATA REQUEST

KPSC 1_7 Submit a map with aerial photography that shows the residences and garage for the three customers, and label them. Include the intersection of Ky-40 and Prestons Branch Road. Show the existing distribution system for Kentucky Power. Show the electric service area boundary and its intersection with Prestons Branch Road.

RESPONSE

Please see KPCO_R_KPSC_1_7_Attachment1 for the requested information.



VERIFICATION

The undersigned, Brian K. West, being duly sworn, deposes and says he is Vice President, Regulatory & Finance for Kentucky Power Company, that he has personal knowledge of the matters set forth in the foregoing responses and the information contained therein is true and correct to the best of his information, knowledge, and belief.

Brian K. West

Commonwealth of Kentucky)

Case No. 2021-00334

Subscribed and sworn before me, a Notary Public, by Brian K. West this 18th day of

)

)

Scott F. Bishop

Notary Public

County of Boyd

October, 2021.

My Commission Expires June 24, 2025

Notary ID Number: KYNP 32.110

