

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF	)	
KENTUCKY UTILITIES COMPANY FOR	)	
AUTHORIZATION OF CHANGES IN	)	CASE NO. 2026-00085
SERVICE TERRITORY WITH SHELBY	)	
ENERGY COOPERATIVE, INC.	)	

RESPONSE OF
KENTUCKY UTILITIES COMPANY
TO
THE COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION

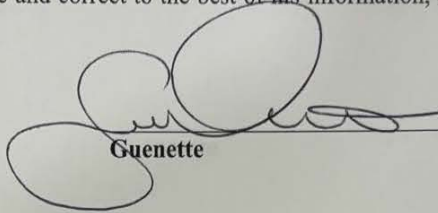
DATED JUNE 2, 2026

FILED: JUNE 18, 2026

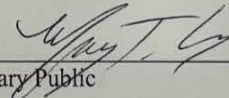
VERIFICATION

COMMONWEALTH OF KENTUCKY)
COUNTY OF JEFFERSON)
oidhan

The undersigned, **Samantha Guenette**, being duly sworn, deposes and says that she is Senior Manager, Operations Center, for Kentucky Utilities Company and an employee of LG&E and KU Services Company, 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.


Guenette Samantha

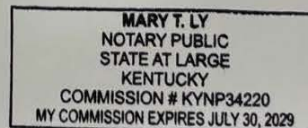
Subscribed and sworn to before me, a Notary Public in and before said County and State, this 15 day of June, 2026.


Notary Public

Notary Public ID No. KYNP34220

My Commission Expires:

07/30/2029



VERIFICATION

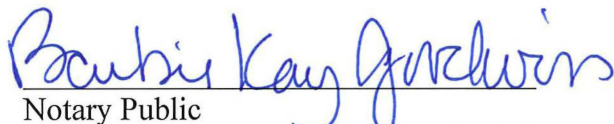
COMMONWEALTH OF KENTUCKY)
)
COUNTY OF JEFFERSON)

The undersigned, **Randy Stevens**, being duly sworn, deposes and says that he is Senior Vice President, Power Delivery Services and an employee of Shelby Energy Cooperative Inc., 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.



Randy Stevens

Subscribed and sworn to before me, a Notary Public in and before said County and State, this 16th day of June 2026.



Notary Public
Notary Public ID No. KYNP44505

My Commission Expires:

2/2/2026

KENTUCKY UTILITIES COMPANY

Response to the Commission Staff's First Request for Information

Dated June 2, 2026

Case No. 2026-00085

Question No. 1

Responding Witness: Samantha Guenette / Randy Stevens

Q-1. Refer to Case No. 2014-00224,¹ final Order, Appendix B. At the time of filing the application in this case, indicate whether KU or Shelby Energy was aware of the previously approved changes to the boundary in Case No. 2014-00224.

A-1. At the time of filing the application in this case, KU personnel involved in this case were not aware of the territorial boundary changes previously approved in Case No. 2014-00224. While a KU representative (now retired) signed off on the proposed territorial changes in Case No. 2014-00224 and KU filed a letter in support of Shelby Energy's application, the changes approved in the Commission's Final Order in that case were not reflected in KU's mapping system. Additionally, the Commission's Quadrant map did not reflect the previously approved changes from Case No. 2014-00224.

On June 22, 2022, KU requested Simpsonville Quadrant 27-E-2 from the Commission in connection with another territorial issue. In response, the Commission provided two quadrant maps dated 1982 and 1992 respectively. KU used the 1992 map believing it was the most current quadrant map. Accordingly, using the 1992 map, KU, with the agreement of Shelby Energy, proceeded on two occasions to request boundary changes on Quadrant map 27-E-2 in Case No. 2022-00287 (KU and Shelby Energy) and Case No. 2023-00201 (KU and Shelby Energy). In both instances, the Commission approved the boundary changes without mention of the prior changes from Case No. 2014-00224.

Because no changes had occurred to territory boundaries in this area since the 2023 case, KU again requested a boundary change to Quadrant 27-E-2 for this present case (Case No. 2026-00085) using the 1992 map.

Shelby Energy response:

At the time of filing the application in this case, Case No. 2026-00085, Shelby Energy was not aware of the territorial boundary changes approved in Case No.

¹ Case No. 2014-00224, Application of Shelby Energy Cooperative, Inc. for Authorization of Changes in Service Territory with Kentucky Utilities Company, Specifically Old Mill Village And Rolling Ridge Subdivisions (Ky. PSC Jan. 23, 2015).

2014-00224. The Shelby Energy representative (now retired) was aware of and signed off on the changes in Case No. 2014-00224.

KENTUCKY UTILITIES COMPANY

**Response to the Commission Staff's First Request for Information
Dated June 2, 2026**

Case No. 2026-00085

Question No. 2

Responding Witness: Samantha Guenette

- Q-2. Provide a new site map for Rolling Ridge that has the corrected boundary which was approved in Case No. 2014-00224. Ensure the new site map has updated coordinates, signatures, and dates.
- A-2. See attachment being provided in a separate file. This new site map reflects the approved territorial boundary line approved in Case No. 2014-00224. KU and Shelby Energy now propose only one change for the Rolling Ridge Subdivision in this case. Because Parcel number 190 is currently being served by Shelby Energy, this change needs to be reflected on the certified territory maps.

KENTUCKY UTILITIES COMPANY

**Response to the Commission Staff's First Request for Information
Dated June 2, 2026**

Case No. 2026-00085

Question No. 3

Responding Witness: Samantha Guenette

- Q-3. Explain why KU is requesting boundary changes nearly identical to those approved twelve years ago in Case No. 2014-00224.²
- A-3. See response to Question Nos. 1 and 2. As explained there, KU personnel working on this matter were not aware of the prior boundary changes in 2014 when filing the application in this case. Now that they are aware of those, KU's request with respect to the Rolling Ridge Subdivision is limited to the proposed boundary change to reflect that Parcel 190 should now be in Shelby Energy's territory.

KU's request in this case regarding the new commercial development for Hunt Midwest remains unchanged, as those requested territorial boundary changes were not part of Case No. 2014-00224.

² Case 2014-00224, (filed July 17, 2014), Application for authorization of changes in service territory with Kentucky Utilities Company, specifically Old Mill Village and Rolling Ridge Subdivisions.

KENTUCKY UTILITIES COMPANY

**Response to the Commission Staff's First Request for Information
Dated June 2, 2026**

Case No. 2026-00085

Question No. 4

Responding Witness: Samantha Guenette / Randy Stevens

- Q-4. Explain whether KU or Shelby Energy have been providing electric services for the area at issue in this application immediately prior to and after the final Order issued in Case No. 2014-00224.
- A-4. As noted in the Application in Case No. 2014-00224, KU and Shelby Energy were both serving the Rolling Ridge Subdivision immediately prior to the filing of that application. They both continued to serve that area after the final Order was issued.

KENTUCKY UTILITIES COMPANY

**Response to the Commission Staff's First Request for Information
Dated June 2, 2026**

Case No. 2026-00085

Question No. 5

Responding Witness: Samantha Guenette

- Q-5. Provide any relevant context/information regarding the area where changes to the boundary are proposed in the Rolling Ridge site map.
- A-5. See the response to Question Nos. 1-3.

KENTUCKY UTILITIES COMPANY

Response to the Commission Staff's First Request for Information

Dated June 2, 2026

Case No. 2026-00085

Question No. 6

Responding Witness: Samantha Guenette

Q-6. Provide an updated quadrant map that shows all historical changes to boundary lines, including the proposed changes in this case. Case numbers to include Case No. 2014-00224,³ Case No. 2022-00287,⁴ Case No. 2023-00201,⁵ Case No. 2026-00085 (current). Include some way to identify the corresponding Commission approval. Ensure the new quadrant map has updated coordinates, signatures, and dates.

A-6. See attachment being provided in a separate file.

Below are the GPS coordinates for the above-referenced cases:

³ Case No. 2014-00224, Application of Shelby Energy Cooperative, Inc. for Authorization of Changes in Service Territory with Kentucky Utilities Company, Specifically Old Mill Village And Rolling Ridge Subdivisions (Ky. PSC Jan. 23, 2015).

⁴ Case No. 2022-00287, Electronic Application of Kentucky Utilities Company for Authorization of Changes in Service Territory with Shelby Energy Cooperative, Inc. (Ky. PSC Dec. 22, 2022).

⁵ Case No. 2023-00201, Electronic Application of Kentucky Utilities Company for Authorization of Changes in Service Territory with Shelby Energy Cooperative, Inc. (Ky. PSC Aug. 31, 2023).

Response to Question No. 6
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Guenette

Case No. 2022-00287

Points	Latitude	Longitude
1	38.232856	-85.274666
2	38.232726	-85.274153
3	38.231659	-85.274542
4	38.230616	-85.274537
5	38.230068	-85.274235
6	38.2297	-85.274347
7	38.22935	-85.274132
8	38.229131	-85.274531
9	38.229083	-85.274619
10	38.229022	-85.274714
11	38.228957	-85.274803
12	38.228892	-85.274893
13	38.22882	-85.274976
14	38.228749	-85.275059
15	38.228701	-85.275114
16	38.228773	-85.275031
17	38.228594	-85.275162
18	38.228428	-85.275222
19	38.228464	-85.275216
20	38.228329	-85.275236
21	38.228097	-85.275275
22	38.227967	-85.27537
23	38.227731	-85.275429
24	38.227536	-85.275461
25	38.227516	-85.275207
26	38.227174	-85.275249
27	38.227037	-85.275282
28	38.22644	-85.27536
29	38.226303	-85.275377
30	38.225856	-85.275436
31	38.226006	-85.276085

Case No. 2023-00201

Points	Latitude	Longitude
1	38.182864	-85.280357
2	38.182989	-85.283087
3	38.185125	-85.280735
4	38.186317	-85.279197
5	38.186004	-85.277604
6	38.186582	-85.276987
7	38.185902	-85.276017
8	38.184957	-85.271817
9	38.185051	-85.27086
10	38.184356	-85.267066
11	38.183947	-85.264908
12	38.183211	-85.264647
13	38.182598	-85.264725

Case. Nos. 2014-00224 and 2026-00085

Points	Latitude	Longitude
1	38.217443	-85.351909
2	38.217451	-85.351349
3	38.217993	-85.351531
4	38.218451	-85.351678
5	38.218521	-85.351786
6	38.218482	-85.351978
7	38.218944	-85.351908
8	38.21849	-85.351067
9	38.217956	-85.35055
10	38.217828	-85.349701
11	38.218097	-85.348953
12	38.217034	-85.348248
13	38.21665	-85.347707
14	38.216419	-85.347839
15	38.216728	-85.348858
16	38.216293	-85.349541
17	38.216791	-85.350191
18	38.216769	-85.350412
19	38.216791	-85.351176
20	38.215493	-85.35084
21	38.214538	-85.348087