

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF BLUE GRASS ENERGY)	
COOPERATIVE CORPORATION TO)	CASE NO.
PASS-THROUGH AN INCREASE OF ITS)	2008-00411
WHOLESALE POWER SUPPLIER PURSUANT)	
TO KRS 278.455(2))	

SECOND DATA REQUEST OF COMMISSION STAFF TO
BLUE GRASS ENERGY COOPERATIVE CORPORATION

Blue Grass Energy Cooperative Corporation ("Blue Grass"), pursuant to 807 KAR 5:001, is to file with the Commission the original and five copies of the following information, with a copy to all parties of record. The information requested herein is due on or before March 24, 2009. Responses to requests for information shall be appropriately bound, tabbed, and indexed. Each response shall include the name of the witness responsible for responding to the questions related to the information provided.

Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association or a governmental agency, be accompanied by a signed certification of the preparer or the person supervising the preparation of the response on behalf of the entity that the response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

Blue Grass shall make timely amendment to any prior response if it obtains information which indicates that the response was incorrect when made or, though correct when made, is now incorrect in any material respect. For any requests to which Blue Grass fails or refuses to furnish all or part of the requested information, Blue Grass shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention shall be given to copied material to ensure that it is legible. When the requested information has been previously provided in this proceeding in the requested format, reference may be made to the specific location of that information in responding to this request. When applicable, the requested information shall be separately provided for total company operations and jurisdictional operations.

1. Provide the workpapers, spreadsheets, etc. that show the calculation of the increase, by individual wholesale rate schedule, in Blue Grass' cost of power from East Kentucky Power Cooperative, Inc. ("EKPC") that Blue Grass proposes to flow through to its customers based on the rates contained in the March 13, 2009 Settlement Agreement filed by EKPC in Case No. 2008-00409 ("Settlement Agreement").¹


2. Provide the proof of revenues for the increase in rates that Blue Grass proposes to implement to recover the increased wholesale power costs it will incur as a result of the Settlement Agreement.

3. Provide analyses which demonstrate the increase has been allocated on a proportional basis to each class and within each tariff, in a manner that does not change

¹ Case No. 2008-00409, General Adjustment of Electric Rates of East Kentucky Power Cooperative, Inc. (Ky. PSC, filed Oct. 31, 2008).

Blue Grass' rate design. The analyses are to be provided in both paper copy and electronic Excel format with all formulas intact.

4. Provide a statement showing, by cross-outs and italicized inserts, all proposed changes in rates. A copy of the current tariff may be used.



Jeff Derduen
Executive Director
Public Service Commission
P.O. Box 615
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DATED: MARCH 18, 2009

cc: All Parties

Case No. 2008-00411

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