

**OWEN Electric**

A Touchstone Energy Cooperative 

RECEIVED

JAN 12 2009


PUBLIC SERVICE  
COMMISSION

**Rate Case No.  
2008-00421**

**1ST DATA REQUEST OF THE PUBLIC SERVICE  
COMMISSION STAFF TO  
OWEN ELECTRIC COOPERATIVE INC**

**8205 Hwy 127 N  
PO Box 400  
Owenton, KY 40359  
502-484-3471**

**OWEN Electric**

Anchor Fouchstone Energy Cooperative 

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**JAN 12 2009**

**PUBLIC SERVICE  
COMMISSION**

January 12, 2009

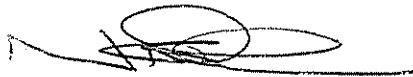
Jeff Derouen  
Executive Director  
Kentucky Public Service Commission  
211 Sower Boulevard  
P. O. Box 615  
Frankfort, KY 40602

Dear Mr. Derouen:

Please find enclosed the original and five (5) copies of the responses to the Public Service Commission's Order "Initial Request of Commission Staff" to Owen Electric Cooperative, Inc. posted on December 19, 2008.

Please contact me with any questions regarding this filing.

Respectfully submitted,



Mark Stallons  
President and CEO

Enclosure

Cc Attorney General  
Utility Intervention and Rate Division  
1024 Capital Center Drive  
Frankfort, KY 40601

Michael Kurtz, Esq.  
Boehm, Kurtz & Lowry  
36 East Seventh Street  
Suite 1510  
Cincinnati, Ohio 45202

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF OWEN ELECTRIC )  
COOPERATIVE CORPORATION FOR )  
AN ORDER AUTHORIZING AN ) CASE NO. 2008-00421  
INCREASE IN ITS RETAIL ELECTRIC )  
RATES EQUAL TO THE INCREASE )  
IN ITS WHOLESALE POWER COSTS )

INITIAL DATA REQUEST OF COMMISSION STAFF TO  
OWEN ELECTRIC COOPERATIVE CORPORATION

Owen Electric Cooperative Corporation ("Owen"), pursuant to 807 KAR 5:001, is to file with the Commission the original and 5 copies of the following information, with a copy to all parties of record. The information requested herein is due on or before January 12, 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.

Owen 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 Owen fails or refuses to furnish all or part of the requested information, Owen 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.

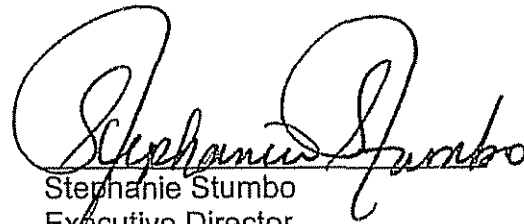
1. Refer to Exhibit C of the application, page 37A. This page shows an increase in the Schedule III SOLS – Special Outdoor Lighting Service from .052114 to .05800. Explain why this increase is not shown in the customer notice provided in Exhibit D.

2. Refer to Exhibit E of the application, page 5 of 6. Under the "Summary Normalized" section, it appears that the substation allocation is \$16,831 higher for Schedule E and \$16,831 lower for Schedule B than is shown in Case Number 2008-00154, Owen's pending rate case. Explain the difference and state which is correct.

3. Refer to Exhibit J of the application, page 4 of 14. Under "Flow Through Proposed", explain why the energy rate used in this calculation is .05873 when it is shown as .05853 in Exhibits C and D.

4. Refer to Exhibit J of the application, page 8 of 14. Under "Flow Through

Proposed", explain why the energy rate used in this calculation is .0961 when it is shown as .09661 in Exhibits C and D.

A handwritten signature in black ink, appearing to read "Stephanie Stumbo". The signature is fluid and cursive, with the first name being particularly prominent.

Stephanie Stumbo  
Executive Director  
Public Service Commission  
P.O. Box 615  
Frankfort, KY 40602

DATED: DECEMBER 19, 2008

cc: All Parties

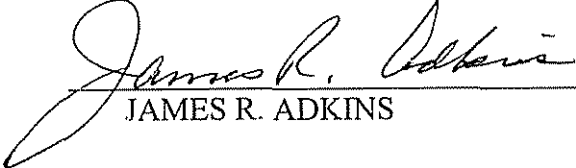
Case No. 2008-00421

Honorable James M Crawford  
Attorney At Law  
Crawford & Baxter, P S C, Attorneys at Law  
523 Highland Avenue  
P O Box 353  
Carrollton, KY 41008

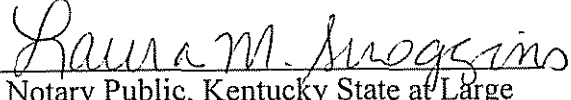
Robert Hood  
President/CEO  
Owen Electric Cooperative, Inc.  
8205 Highway 127 North  
P O Box 400  
Owenton, KY 40359

Honorable Michael L Kurtz  
Attorney at Law  
Boehm, Kurtz & Lowry  
36 East Seventh Street  
Suite 1510  
Cincinnati, OH 45202

Affiant, James R. Adkins, states that the answers given by hi to the foregoing questions are true and correct to the best of his knowledge and belief.

  
\_\_\_\_\_  
JAMES R. ADKINS

Subscribed and sworn to before me by the affiant, James R. Adkins, this 12<sup>th</sup> day of January, 2009.

  
\_\_\_\_\_  
Notary Public, Kentucky State at Large

My Commission Expires: May 2 2012

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OWEN ELECTRIC COOPERATIVE  
CASE NO. 2008-00421

RESPONSE TO COMMISSION STAFF'S INITIAL DATA REQUEST

**Question:**

Refer to Exhibit C of the application, page 37A. This page shows an increase in Schedule III SOLS – Special Outdoor Lighting Service from .052114 to .05800. Explain why this increase is not shown in the customer notice provided in Exhibit D.

**Response:**

The increase in the wholesale component of Schedule III SOLS – Special Lighting Service was mistakenly not included in Exhibit D. It should have been included. It was most probably not included as no customers are currently receiving service under this tariff. The billing analysis provided in Exhibit J of the application confirms the fact that no customers were provided service under this tariff during the test year.

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OWEN ELECTRIC COOPERATIVE  
CASE NO. 2008-00421

RESPONSE TO COMMISSION STAFF'S INITIAL DATA REQUEST

**Question:**

Refer to Exhibit E of the application, page 5 of 6. Under the "Summary Normalized" section, it appears that the substation allocation is \$16,831 higher for Schedule E and \$16,831 lower for Schedule B than is shown in Case No. 2008-00154, Owen's pending rate case. Explain the difference and state which is correct.

**Response:**

Upon review of the "Summary Normalized" section, page 5 of 6 in Exhibit E of the application in this case and the application in Case No. 2008-00154, no similar schedule was filed as a part of the application in Case No. 2008-00154. A similar schedule applicable to Case No. 2008-00154 was a part of the cost of service study ("COSS") filed in electronic form as requested in the Commission Staff's second data request. The "Summary Normalized" section for Exhibit E in Case No. 2008-00421 seems to be the same as the "Summary Normalized" section in the electronic version of the COSS files as a response to Item 10 in the Commission Staff's second data request in Case No. 2008-00154.

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OWEN ELECTRIC COOPERATIVE  
CASE NO. 2008-00421

RESPONSE TO COMMISSION STAFF'S INITIAL DATA REQUEST

**Question:**

Refer to Exhibit J of the application, page 4 of 14. Under "Flow Through Proposed", explain why the energy rate used in this calculation is .05873 when it is shown as .05853 in Exhibits C and D.

**Response:**

An error was made in Exhibits C and D when these tariff sheets were being developed. Page 4 of 14 of Exhibit J contains the proper energy rate of .05873.

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OWEN ELECTRIC COOPERATIVE  
CASE NO. 2008-00421

RESPONSE TO COMMISSION STAFF'S INITIAL DATA REQUEST

**Question:**

Refer to Exhibit J of the application, page 8 of 14. Under "Flow Through Proposed", explain why the energy rate used in this calculation is .0961 when it is shown as .09661 in Exhibits C and D.

**Response:**

An error was made in Exhibits C and D when these tariff sheets were being developed. Page of 14 of Exhibit J contains the proper energy rate of .09610.