

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

REQUEST OF KENERGY CORP. TO PROVIDE)	CASE NO.
TEMPORARY REDUCED-RATE SERVICE)	2009-00071
PURSUANT TO KRS 278.170(2))	

COMMISSION STAFF'S DATA REQUEST
TO KENERGY CORP.

Kenergy Corp. ("Kenergy"), 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 March 11, 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.

Kenergy 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 request to which Kenergy fails or refuses to furnish all or part of the requested information, it 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. Kenergy's February 18, 2009 letter to the Commission states that, initially, approximately 42,000 of its 55,000 customers were without power due to the ice storms of the last week of January 2009. The letter also states that Kenergy does not have the ability to determine how long any one customer was without power.

a. Explain whether Kenergy has the capability to readily determine which customers did not lose power due to the ice storms of the last week of January 2009.

b. If the answer to part a. of this response is yes, provide the number of non-direct serve customers that did not lose power due to the ice storms.

2. Direct serve customers, who receive service directly from the transmission system of Kenergy's wholesale power supplier, are not to receive the proposed one-time reduction in customer charges.

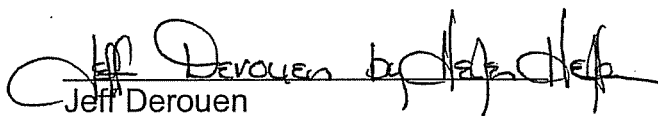
a. Explain whether any Kenergy direct serve customer lost power at any time due to the ice storms of the last week of January. If no direct serve customer lost power, explain if this is why they will not receive the customer charge reduction that is planned for the non-direct serve customers.

b. If the response to part a. of this request does not do so, explain why direct serve customers will not receive a reduction in their customer charges under Kenergy's proposal.

3. Provide an estimate of the total lost sales in kilowatt hours and total lost revenue experienced by Kenergy as a result of the prolonged outages due to the ice storm.

4. Based upon Kenergy's estimate of lost sales, provide the approximate cost of the additional power that Kenergy estimates it would have purchased if the storm outages had not occurred.

5. Explain the reasoning by which Kenergy decided on a 50-percent reduction in the customer charge.


Jeff Derouen
Executive Director
Public Service Commission
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DATED: MARCH 5, 2009

cc: Parties of Record

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