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Dr. Talina Mathews, Executive Director
Kentucky Public Service Commission
211 Sower Boulevard
Frankfort, Kentucky 40601

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MAY 12 2017

PUBLIC SERVICE
COMMISSION

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May 12, 2017

RE: APPLICATION OF KENTUCKY UTILITIES COMPANY FOR
AUTHORIZATION OF CHANGES IN SERVICE TERRITORY
WITH BLUE GRASS ENERGY COOPERATIVE
Case No. 2017-00139

Dear Dr. Mathews:

Enclosed please find and accept for filing the original and ten copies of Kentucky Utilities Company's Response to the Commission's First Data Request of May 4, 2017 in the above-referenced matter.

Should you have any questions regarding the enclosed, please contact me at your convenience.

Sincerely,

Rick E. Lovekamp

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

**APPLICATION OF KENTUCKY UTILITIES
COMPANY FOR AUTHORIZATION OF
CHANGES IN SERVICE TERRITORY WITH
BLUE GRASS ENERGY COOPERATIVE**)
) **CASE NO.**
) **2017-00139**
)

**RESPONSE OF
KENTUCKY UTILITIES COMPANY
TO
COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
DATED MAY 4, 2017**

FILED: May 12, 2017

KENTUCKY UTILITIES COMPANY

**Response to Commission Staff's First Request for Information
Dated May 4, 2017**

Case No. 2017-00139

Question No. 1

Witness: Christopher Mayes

Q-1. Explain why the boundary change is being requested.

A-1. Blue Grass Energy ("Blue Grass") approached Kentucky Utilities Company ("KU") regarding the possibility of KU providing electrical service to a new home to be constructed by Mr. Larry Redmon. Said service is located wholly within Blue Grass' territory.

Blue Grass and KU Engineering groups met and determined that since access issues prevented Blue Grass from serving the Redmon property, KU's existing distribution lines were easily accessible and could be extended to serve the property. During this same review, both KU and Blue Grass representatives realized that the existing KU service to Mr. Scott Wells' property was actually extended into Blue Grass' service territory. Therefore both KU and Blue Grass determined that this boundary change request must include not only the Redmon property but also the Wells' property in light of the recent discovery.

In accordance with 807 KAR 5:001 Section 14 the request for Commission approval was made.

Please note that when territorial boundaries were first established in 1972 and reaffirmed in 1982, mapping and GPS systems were not as accurate as they are today. Therefore when anomalies are discovered the utilities rectify them with a territorial change request filing.

KENTUCKY UTILITIES COMPANY

**Response to Commission Staff's First Request for Information
Dated May 4, 2017**

Case No. 2017-00139

Question No. 2

Witness: Christopher Mayes

- Q-2. KU states in the application, page 2, paragraph 4, that it will "continue to serve the Wells' property and will provide new service to the Redmon property." Provide a copy of the written agreement under which KU is currently providing service to the Wells' property, and if no such written agreement exists, an explanation as to why KU is currently providing service to the property.
- A-2. No written agreement exists. KU has been providing service to the Wells' property for approximately 20 years (since May 21, 1997). It appears KU inadvertently provided service within Blue Grass' territory. Given the technology available at the time, it is not unusual for utilities to mistakenly serve customers that fall just outside of their territory. The mistake wasn't realized until both utilities began investigating the possibility of providing service to the Redmon property.

KENTUCKY UTILITIES COMPANY

**Response to Commission Staff's First Request for Information
Dated May 4, 2017**

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Question No. 3

Witness: Christopher Mayes

- Q-3. KU submitted two maps with its application, a large map which indicates that it is a territorial map reconfirmed by the parties in 1982, and a smaller map titled "Drawing name: Redmon" in the lower right corner. Provide a more detailed explanation as to what the smaller of the two maps represents in relation to the larger one.
- A-3. The site map is simply a zoomed-in view of the same affected area that is shown on the official quadrant map.

Quadrant maps, such as the Millersburg, KY 32-D-3, are typically scaled 24,000 feet to the inch. The quadrant map does not allow for a clear view of the boundary line changes. The site map provides a view of the modifications that should assist the Commission with their GIS changes to the state mapping system. Both maps utilize the same GPS coordinates.