COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF KENTUCKY)	
UTILITIES COMPANY FOR AUTHORIZATION)	CASE NO.
OF CHANGES IN SERVICE TERRITORY WITH)	2020-00135
FARMERS RURAL ELECTRIC COOPERATIVE)	
CORPORATION)	

COMMISSION STAFF'S INITIAL REQUEST FOR INFORMATION TO KENTUCKY UTILITIES COMPANY

Kentucky Utilities Company (KU), pursuant to 807 KAR 5:001, is to file with the Commission an electronic version of the following information. The information requested herein is due within 14 days of the date of this request. The Commission directs KU to the Commission's March 16, 2020 and March 24, 2020 Orders in Case No. 2020-00085¹ regarding filings with the Commission. The Commission expects the original documents to be filed with the Commission within 30 days of the lifting of the current state of emergency. All responses in paper medium shall be appropriately bound, tabbed, and indexed. Electronic documents shall be in portable document format (PDF), shall be searchable, and shall be appropriately bookmarked.

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

¹ Case No. 2020-00085, Electronic Emergency Docket Related to the Novel Coronavirus COVID-19 (Ky. PSC Mar. 16, 2020), Order at 5–6. Case No. 2020-00085, Electronic Emergency Docket Related to the Novel Coronavirus COVID-19 (Ky. PSC Mar. 24, 2020), Order at 1–3.

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.

KU shall make timely amendment to any prior response if KU 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 KU fails or refuses to furnish all or part of the requested information, KU 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. When filing a paper containing personal information, KU shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

- 1. Refer to the application, page 2, and Exhibit 1. Confirm that the trailer home located at 475 Guthrie Street is the property owner's residence.
- 2. Refer to the application, page 2, and Exhibit 1. Provide documentation showing that the property owner has consented to the change in electric service provider.
- 3. Refer to the application, page 2, and Exhibit 1. Provide documentation that the property owner is aware of the differences in KU's and Farmers Rural Electric

Cooperative Corporation's (Farmers RECC) electric service rates and the likely differences in monthly bills.

- 4. Refer to the application, Exhibit 1 maps at 10–11.
- a. It is not clear where the property highlighted on the detailed site map on page 11 is situated in the quadrant map on page 10. Provide the appropriate detail. Include an arrow with the case number pointing to the adjusted boundary. Submit this map as a separate PDF file so that the quality of the image is not degraded by becoming pixelated.
- b. The detailed site map on page 11 with the existing electric service area boundary in yellow and the boundary changes is sufficient, except the northings and eastings are illegible in the submission. Resubmit this map as a separate PDF file so that the quality of the image is not degraded by becoming pixelated.
- c. Make a new detailed site map of the area showing the existing electric service area boundary, the mobile home at 475 Guthrie Street, property lines for the area, and existing Farmers RECC and KU electric lines in order to illustrate the difficulties encountered by KU that led to the request of Farmers RECC to serve the customer. Show the route that will be utilized by Farmers RECC to serve the customer. (This map does not need to be signed and dated by both parties.) Submit this map as a separate PDF file.

Kent A. Chandler Executive Director

Public Service Commission

P.O. Box 615

Frankfort, KY 40602

DATED <u>JUN 05 2020</u>

cc: Parties of Record

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