COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF KENTUCKY UTILITIES COMPANY FOR AUTHORIZATION OF CHANGES IN SERVICE TERRITORY WITH SOUTH KENTUCKY RURAL ELECTRIC COOPERATIVE CORPORATION

CASE NO. 2021-00372

<u>COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION</u> <u>TO KENTUCKY UTILITIES COMPANY</u>

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 is due on January 18, 2022. The Commission directs KU to the Commission's July 22, 2021 Order in Case No. 2020-00085¹ regarding filings with the Commission. Electronic documents shall be in portable document format (PDF), shall be searchable, and shall be appropriately bookmarked.

Each response shall include the question to which the response is made, and 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

¹ Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19* (Ky. PSC July 22, 2021), Order (in which the Commission ordered that for case filings made on and after March 16, 2020, filers are NOT required to file the original physical copies of the filings required by 807 KAR 5:001, Section 8).

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 that indicates 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 3, paragraph 5. Describe how the developer contacted South Kentucky Rural Electric Cooperative Corporation (South Kentucky RECC) to request to change electric service from South Kentucky RECC to KU, and provide documentation of the request.

2. Refer to the Application, page 3, paragraph 5. Describe how South Kentucky RECC contacted KU to request to change electric service from South Kentucky RECC to KU, and provide documentation of the request.

3. Explain whether KU will charge the new residents different rates than the rates the new residents would have paid to South Kentucky RECC, and provide a

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schedule comparing the rates the new residents will be pay to KU and would have paid to South Kentucky RECC.

4. Describe in detail any alternatives to the proposed agreement that were considered by KU and South Kentucky RECC.

5. Refer to the Application, Exhibit 3, the Delmer Site Map.

a. There are two rows in the coordinate table and the map labeled Point Number 4, and Number 7 is missing. Confirm that the second reference to Point Number 4 should be Point Number 7 on the table and on the map, and, if confirmed, provide a revised map and the table. If this cannot be confirmed, explain why there are two Point Number 4s and no Point Number 7.

b. Insert the name of the Coordinate System that defines the Eastings and Northings, as well as the Datum (such as NAD 1983), on the map below the table. If this is an unusual coordinate system, please include the parameters that define it.

c. Submit a revised Exhibit 3, signed and dated as required by KRS 278.017.

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C Bridwell

Linda C. Bridwell, PE Executive Director Public Service Commission P.O. Box 615 Frankfort, KY 40602

DATED _____ DEC 21 2021

cc: Parties of Record

*Honorable Allyson K Sturgeon Managing Senior Counsel - Regulatory & LG&E and KU Energy LLC 220 West Main Street Louisville, KENTUCKY 40202

*South Kentucky R.E.C.C. 200 Electric Avenue Somerset, KY 42501

*Rick LoveKamp Kentucky Utilities Company 220 W. Main Street P. O. Box 32010 Louisville, KY 40202

*Robert Conroy Vice President, State Regulation and Rates LG&E and KU Energy LLC 220 West Main Street Louisville, KENTUCKY 40202

*Sara Judd Senior Corporate Attorney LG&E and KU Energy LLC 220 West Main Street Louisville, KENTUCKY 40202

*Kentucky Utilities Company 220 W. Main Street P. O. Box 32010 Louisville, KY 40232-2010