

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

|                                      |   |            |
|--------------------------------------|---|------------|
| ELECTRONIC JOINT APPLICATION OF      | ) |            |
| KENTUCKY UTILITIES COMPANY, NOLIN    | ) |            |
| RURAL ELECTRIC COOPERATIVE           | ) |            |
| CORPORATION, AND EAST KENTUCKY POWER | ) |            |
| COOPERATIVE, INC. FOR APPROVAL OF AN | ) | CASE NO.   |
| AGREEMENT MODIFYING AN EXISTING      | ) | 2021-00462 |
| TERRITORIAL BOUNDARY MAP AND         | ) |            |
| ESTABLISHING THE RETAIL ELECTRIC     | ) |            |
| SUPPLIER FOR GLENDALE MEGASITE IN    | ) |            |
| HARDIN COUNTY, KENTUCKY              | ) |            |

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION  
TO KENTUCKY UTILITIES COMPANY, NOLIN RURAL ELECTRIC COOPERATIVE  
CORPORATION, AND EAST KENTUCKY POWER COOPERATIVE, INC.

Kentucky Utilities Company (KU), Nolin Rural Electric Cooperative Corporation (Nolin RECC), and East Kentucky Power Cooperative, Inc. (EKPC) (collectively, Joint Applicants), pursuant to 807 KAR 5:001, are to file with the Commission an electronic version of the following information. The information requested is due on January 12, 2022. The Commission directs Joint Applicants to the Commission's July 22, 2021 Order in Case No. 2020-00085<sup>1</sup> regarding filings with the Commission. Electronic documents shall be in portable document format (PDF), shall be searchable, and shall be appropriately bookmarked.

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<sup>1</sup> 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).

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 response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

Joint Applicants shall make timely amendment to any prior response if Joint Applicants obtain 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 Joint Applicants fail or refuse to furnish all or part of the requested information, Joint Applicants 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, Joint Applicants shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. Provide projected costs for KU extending service to the Glendale MegaSite.

2. Provide all documents, studies, and workpapers supporting the projected costs for KU extending service to the Glendale MegaSite.

3. Provide projected costs for Nolin RECC extending service to the Glendale MegaSite.

4. Provide all documents, studies, and workpapers supporting the projected costs for Nolin RECC extending service to the Glendale MegaSite.

5. Refer to the Application, Exhibit 1, Joint Settlement Agreement, page 5.

a. Provide an explanation for how this settlement sum was determined.

b. Provide all documents, studies, and workpapers supporting the determination of the settlement sum.

6. Refer to the Application, Exhibit 1, Joint Settlement Agreement, page 1. Describe the nature of the issue or disagreement regarding territorial boundaries that precipitated the creation of the Joint Settlement Agreement.

7. Refer to the Application, Exhibit 1, Joint Settlement Agreement, page 6. Provide all documents reflecting projected costs for moving or removing Nolin RECC and EKPC facilities.

8. Refer to the Application, page 6, paragraph 18. State whether KU, for the purposes of the regulatory asset, is indicating the payments referenced in Sections 2 and 3 of the Settlement Agreement are extraordinary. If this can be confirmed, explain the reason KU believes the amounts are extraordinary for the purposes of meeting the criteria cited as “an extraordinary, nonrecurring expense which could not have reasonably been anticipated or included in the utility’s planning.”

9. Explain in what account or accounts KU will record the proposed regulatory asset.

10. Explain whether KU will seek carrying charges on the proposed regulatory asset.

11. Explain when Joint Applicants first became aware that the Glendale MegaSite was to be located in Nolin RECC's and KU's territories.

12. Revise Exhibit 2.3 to the Application to include only the coordinates that define the new boundary line, excluding coordinates that are not on the new boundary line. The revised map should contain certified signatures and date of signing.

13. Refer to the Application, Exhibit 2.3. It is not clear what point 10 connects to and whether points 18, 19, 20, 21, 22, 23, 24, 25, and 26 define a line with jogs in it. The revised Exhibit 2.3, discussed above, should clarify those issues.

14. Provide a map that defines the new and expanded KU boundary into Nolin RECC's service territory, and include the coordinate points and coordinate table. The map should be signed and dated. By way of explanation, according to the Application, Exhibit 2.2, the map should start at Coordinate 35 and end at Coordinate 83, as depicted in Exhibit 2.2.

15. Refer to the Application, Exhibit 3.8, which shows point 106 coincident with the existing service territory. This does not match the existing service territory boundary that was filed pursuant to Case No. 1994-00331.<sup>2</sup> If the existing line runs as indicated on Exhibit 3.8, and if you use 2020 imagery, there is a home on Hackberry Road that is

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<sup>2</sup> Case No. 1994-00331, *Application of Kentucky Utilities Company for Authorization of Changes In Service Territory with Blue Grass RECC, Clark RECC, Jackson Purchase ECC, Nolin RECC, and Salt River RECC* (Ky. PSC Nov. 1, 1994).

serviced by KU and the rest are serviced by Nolin RECC.<sup>3</sup> Provide a corrected boundary map by revising Exhibit 3.8 or submitting a new map, and insert additional points that define the boundary in this area of the Lakewood subdivision. The map should be signed and dated.

16. Refer to KRS 278.016, which states that the purpose of the electric service areas is “to avoid wasteful duplication of distribution facilities, to avoid unnecessary encumbering of the landscape of the Commonwealth of Kentucky, to prevent the waste of materials and natural resources.” Describe how the proposed boundary changes are better served by Nolin than KU in the following areas, given the location of existing KU and Nolin distribution lines.

17. Refer to the Application, Exhibit 3.2. Provide maps that show the existing distribution lines and the following parcels with the new and old electric service area boundaries:

- a. Parcels 17 and 17a
- b. Parcels 16 and 20
- c. Parcels 6 and 24
- d. Parcels 3, 4, 1, 12, 13, 9, and 10
- e. Parcels 18, 19, 29, 28, 27, and 26
- f. Parcels 7, 8, and 21

18. Describe how KU will use its existing facilities to serve the Glendale MegaSite.

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<sup>3</sup> The boundary map can be viewed at <https://opengisdata.ky.gov/datasets/ky-electric-service-areas-lines/explore>.

19. Provide a map that shows the facilities belonging to either Nolin RECC or EKPC, and indicate those that will be removed or moved, and the facilities belonging to KU that will be expanded to serve the Glendale MegaSite. Include the boundaries of the Glendale MegaSite.



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Executive Director  
Public Service Commission  
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DATED JAN 05 2022

cc: Parties of Record

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