

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF BLUE GRASS	)	
ENERGY COOPERATIVE CORPORATION FOR	)	CASE NO.
AUTHORIZATION OF CHANGES IN CERTIFIED	)	2024-00356
SERVICE TERRITORY WITH SALT RIVER	)	
ELECTRIC COOPERATIVE CORPORATION	)	

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION  
TO BLUE GRASS ENERGY COOPERATIVE CORPORATION AND SALT RIVER  
ELECTRIC COOPERATIVE CORPORATION

Blue Grass Energy Cooperative Corporation (Blue Grass Energy) and Salt River Electric Cooperative Corporation (Salt River Electric), pursuant to 807 KAR 5:001, shall file with the Commission an electronic version of the following information. The information requested is due on December 16, 2024. The Commission directs Blue Grass Energy and Salt River Electric 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.

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

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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).

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.

Blue Grass Energy and Salt River Electric shall make timely amendment to any prior response if Blue Grass Energy and Salt River Electric obtain information that indicate the response was incorrect or incomplete when made or, though correct or complete when made, is now incorrect or incomplete in any material respect.

For any request to which Blue Grass Energy and Salt River Electric fail or refuse to furnish all or part of the requested information, Blue Grass Energy and Salt River Electric shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention shall be given to copied and scanned 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, Blue Grass Energy and Salt River Electric 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, paragraph 7.
  - a. Confirm that no existing customer of Salt River Electric take service within the 1.38 square mile area proposed under this boundary change.

- b. If not confirmed, provide the number of existing customers taking service within this parcel and which utility will provide service, if approved.
  - c. Identify the existing Blue Grass Energy facilities that will be utilized to extend service to the new customer.
  - d. Identify any additional lines and facilities Blue Grass Energy would need to build to extend service to the new customer.
  - e. Provide an estimate of cost to construct any new lines and facilities.
  - f. Explain what facilities Salt River Electric would have to build to provide electric service to any new customers in that area.
  - g. Provide an estimate of cost to construct facilities to support service in this parcel.
2. Refer to the Application, Exhibit 2. Explain why the map refers to the boundary as Fox Creek RECC.
3. Refer to the Application, paragraph 5. Explain how the service territory change would minimize disputes between electric providers.



Linda C. Bridwell, PE  
Executive Director  
Public Service Commission  
P.O. Box 615  
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DATED DEC 4 2024

cc: Parties of Record

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