

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

RUSSELL MURPHY, JR.)	
)	
COMPLAINANT)	
)	
V.)	CASE NO. 2014-00106
)	
INTER-COUNTY ENERGY COOPERATIVE CORPORATION)	
)	
DEFENDANT)	

COMMISSION STAFF'S INITIAL REQUESTS FOR INFORMATION
TO INTER-COUNTY ENERGY COOPERATIVE CORPORATION

Defendant Inter-County Energy Cooperative Corporation ("Inter-County"), pursuant to 807 KAR 5:001, is to file with the Commission the original and nine copies of the following information, with a copy to all parties of record. The information requested herein is due on or before June 23, 2014. Responses to requests for information shall be appropriately bound, tabbed, and indexed. 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 association or a governmental agency, be accompanied by a signed certification of the preparer or 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.

Inter-County shall make timely amendment to any prior responses if it 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 requests to which Inter-County fails or refuses to furnish all or part of the requested information, it shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention should 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.

1. Provide copies of any and all correspondence between Inter-County and Complainant regarding any outages experienced by Complainant within the last ten years.

2. Provide copies of any and all audio recordings of telephone conversations between Complainant and any representative of Inter-County relating to any outages experienced by Complainant.

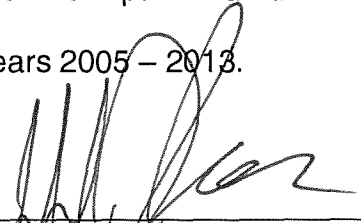
3. Provide copies of any and all documents that Inter-County may possess regarding any outages that Complainant has experienced within the last ten years.

4. Refer to paragraph 5.i. of Inter-County's Answer to Complaint.

- a. Provide the System Average Interruption Duration Index data for Circuit #3 of the Peyton Store Substation for the years 2005 – 2008.

- b. Provide the System Average Interruption Frequency Index data for Circuit #3 of the Peyton Store Substation for the years 2005 – 2008.

c. Provide the Customer Average Interruption Duration Index data for Circuit #3 of the Peyton Store Substation for the years 2005 – 2013.



Jeff Derouen
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Public Service Commission
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DATED JUN 09 2014

cc: Parties of Record

Case No. 2014-00106

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