

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

FRANK MCANINCH)	
)	
COMPLAINANT)	
)	
V.)	CASE NO.
)	2013-00165
)	
TAYLOR COUNTY RURAL ELECTRIC)	
COOPERATIVE CORPORATION)	
)	
DEFENDANT)	

COMMISSION STAFF'S INITIAL REQUEST FOR INFORMATION
TO FRANK MCANINCH

Complainant, Frank McAninch ("Complainant"), pursuant to 807 KAR 5:001, shall file with the Commission the original and eight copies of the following information with a copy to all parties of record. The information requested herein is due on or before July 19, 2013. 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.

Complainant shall make timely amendment to any prior response 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 request to which Complainant fails or refuses to furnish all or part of the requested information, Complainant shall provide a written explanation of the specific grounds for his 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. State all addresses at which you presently receive electric service from Taylor County Rural Electric Cooperative Corporation ("Taylor County RECC").

2. State whether current services were initiated in your personal name or on behalf of another legal entity. If initiated in the name of a legal entity, identify the entity.

3. State the address where the subject building to which service was requested is located.

4. Refer to Exhibit A of Taylor RECC's Answer. The form identifies Rich Hill Farms as the business name for the service request. State whether the November 2012 application for service was requested individually, on behalf of Rich Hill Farms, the McAninch M F & Vivien Trust or any other legal entity.

5. State the names of all individuals and entities that have an ownership interest in the property on which the subject building rests.

6. State the names of all individuals and entities that have an ownership interest in the building to which service was requested.

7. State whether the property and/or building at issue is held or owned by the McAninch M F & Vivien Trust. If yes:

- a. Identify the trustee of the McAninch M F & Vivien Trust.
- b. Identify the beneficiaries of the McAninch M F & Vivien Trust.
- c. State what type of trust the McAninch M F & Vivien Trust is and whether it is revocable or irrevocable.

8. a. State whether the subject building is owned by Rich Hill Farms.
- b. Identify the owners of Rich Hill Farms.
- c. State whether Rich Hill Farms is a sole proprietorship, partnership, corporation or other business structure.

9. State whether wood products processed at the subject building are commercially sold.

10. State the quantity and type of lumber products sold in year 2012.

11. State the gross earnings generated by the sale of lumber products for year 2012.

12. State all purposes, inclusive of farm, commercial and non-commercial uses, to which the subject building is or will be utilized.

13. Provide a full copy of the original e-mail, discussed on page 2 of the complaint, sent to South Kentucky Rural Electric Cooperative Corporation.

14. State whether you intend on operating an electrically powered saw in the subject building.

15. Describe the type of equipment that is or will be utilized in the subject building.

16. a. State the number of employees and/or family members that perform work in the subject building.

b. State their names, duties and whether they perform full or part-time work.

17. State the approximate number of hours per week the subject building is utilized for wood cutting or processing operations.

18. State the approximate number of hours per week the subject building is utilized for uses other than wood cutting or processing.



Jeff Derouen
Executive Director
Public Service Commission
P.O. Box 615
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DATED **JUL 03 2013**

cc: Parties of Record

Frank McAninch
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