## COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

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FRANK MCANINCH		)	
V.	COMPLAINANT	) ) )	CASE NO. 2013-00165
TAYLOR COUNTY RUI COOPERATIVE CORP		) )	2010 00103
	DEFENDANT	)	

## COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION TO TAYLOR COUNTY RURAL ELECTRIC COOPERATIVE CORPORATION

Taylor County Rural Electric Cooperative Corporation ("Taylor RECC"), 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 14 days after the date of this request. 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.

Taylor RECC 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 Taylor RECC fails or refuses to furnish all or part of the requested information, Taylor RECC 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. When applicable, the requested information shall be separately provided for total company operations and jurisdictional operations.

- 1. Refer to Taylor RECC's response to Item 6.a. of Commission Staff's Initial Request for Information ("Staff's First Request"). Provide a sample large power contract as it pertains to saw mills, or other questionable permanent service.
  - 2. Refer to the response to Item 7 of Staff's First Request, Exhibit 1.d.
- a. Provide a detailed supporting calculation for "INSTALL LABOR" of \$3,175.60. The calculation should include an estimate of hours worked, as well as the associated labor rates.
- b. Provide a detailed supporting calculation for "RETIREMENT LABOR" of \$1,871.60. The calculation should include an estimate of hours worked, as well as the associated labor rates.
- c. Provide a detailed supporting calculation for the 130 percent figure utilized for "LABOR OVERHEAD."

- d. Provide an itemized statement supporting the calculation of "MATERIAL COST" of \$3,237.36. The calculation should include dollar amounts for each of the items listed on Exhibit 1.f. of Taylor RECC's Responses to Staff's First Request.
- 3. Refer to the response to Item 7 of Staff's First Request, Exhibit 1.e. State whether Taylor RECC will perform the labor portion of the installation and retirement of the requested service, or if Taylor RECC will subcontract it to a third party. If Taylor RECC is subcontracting the labor to a third party, provide the following:
- a. An explanation stating why a separate line item for "LABOR OVERHEAD" is being charged for third-party contract work.
- b. All written estimates between the third-party contractor and Taylor RECC relating to this service request.
- c. All contracts between the third-party contractor and Taylor RECC relating to this service request.
- 4. If the service does not achieve permanency and retirement of the installed materials occurs before all job costs have been refunded, state whether Complainant is entitled to receive the non-refunded balance paid for materials salvaged and returned to inventory by Taylor RECC.
- 5. Refer to Taylor RECC's tariff, PSC No. 5, Sheet No. 16, "Distribution Line Extensions To Mobile Homes." State how this provision came to be included in Taylor RECC's tariff. If it was authorized by Commission Order, provide the Order number.

Jeff Deroulen
Executive Director
Public Service Commission

P.O. Box 615

Frankfort, KY 40602

DATED	DEC	03	2013	
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cc: Parties of Record

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