

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC INVESTIGATION OF THE	)	
PROPOSED POLE ATTACHMENT TARIFFS OF	)	CASE NO.
RURAL ELECTRIC COOPERATIVE	)	2022-00106
CORPORATIONS	)	

COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION  
TO RURAL ELECTRIC COOPERATIVE CORPORATIONS

Big Rivers Electric Corporation (BREC); Big Sandy RECC; Blue Grass Energy Cooperative Corp. (Blue Grass Energy); Clark Energy Cooperative, Inc. (Clark Energy); Cumberland Valley Electric, Inc.; East Kentucky Power Cooperative, Inc. (EKPC); Farmers RECC; Fleming-Mason Energy Cooperative, Inc. (Fleming-Mason Energy); Grayson RECC; Inter-County Energy Cooperative Corporation (Inter-County Energy); Jackson Energy Cooperative Corporation (Jackson Energy); Jackson Purchase Energy Corporation (Jackson Purchase Energy); Kenenergy Corp.; Licking Valley RECC; Meade County RECC; Nolin RECC; Owen Electric Cooperative, Inc. (Owen Electric); Salt River Electric Cooperative Corp. (Salt River Electric); Shelby Energy Cooperative, Inc. (Shelby Energy); South Kentucky RECC; and Taylor County RECC (collectively, the RECCs), pursuant to 807 KAR 5:001, are each to file separately with the Commission an electronic version of the following information. The information requested is due on June 2, 2022. The Commission directs RECCs 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 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.

RECCs shall make timely amendment to any prior response if RECCs obtains 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 RECCs fails or refuses to furnish all or part of the requested information, RECCs 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

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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).

filing a paper containing personal information, RECCs 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 the service lives of distribution poles used to determine the average service life, by type and vintage, to the degree they are broken down.

2. Describe your recent efforts, if any, to reduce the number of above ground transmission and distribution lines, and identify the number of poles that have been eliminated in your system in each of the last ten years because the electric lines previously attached to those poles were placed underground.

3. Other than identifying specific defective poles through inspections that require replacement, state whether you have a policy or practice of replacing poles in a circuit on a periodic basis or as they reach the end of their useful lives and, if so, describe that policy or practice in detail, including how and when (e.g. how far in advance) such replacements are identified or included in your projected capital spending budget.

4. Describe in detail the process you use to budget for future capital expenditures, including when you first develop a preliminary capital spending budget for a particular year (e.g. three years in advance, five years in advance, etc.), how you determine the amounts to include in the preliminary capital budget, the level of specificity included in any preliminary budget, and each step that is taken in the process to get from any preliminary budget to a final capital spending budget for a particular year.

5. Provide any current joint use agreements.

6. For all except EKPC:

a. Explain each basis for your contention, upon information and belief, that a market exists for the performance bonds required by Article XXI and Appendix D of the proposed tariff.

b. Explain each basis for your contention that remedy through an insurance claim is not typically feasible if an attacher is no longer a going concern.

c. Provide the average cost per attachment for the cooperatives' crews to remove stranded attachments left on the cooperatives used to determine the amount of the performance bond, and explain how that average cost per attachment was reached.

7. For BREC and EKPC only. Identify the number of transmission poles in your system with electric distribution lines attached, generally describe the types of poles on which distribution lines are attached, generally describe the voltage of the transmission lines on poles to which distribution lines are attached, and identify each electric distribution system operator with lines attached to your transmission poles.

8. For Big Sandy RECC only: Refer to Big Sandy RECC's response to Commission Staff's First Request for Information to Rural Electric Cooperative Corporations (Staff's First Request), Item 8 and Item 9.

a. State whether the depreciation rate provided in Item 8 is monthly or annual.

b. State whether the 25 years identified is the average remaining useful life or the average useful life of the poles.

9. For Big Sandy RECC only: Refer to Big Sandy RECC's response to Staff's First Request, Item 11.

a. Explain in detail what you do when you identify a defect with a pole as part of a biannual or 10-year inspection, including specifically when and under what circumstances you would replace a pole due to a defect.

b. Explain how you keep track of when poles are inspected as part of a biannual or 10-year inspection and how you track the condition of the pole at the time of inspection.

10. For Big Sandy RECC only: Refer to Big Sandy RECC's response to Staff's First Request, Item 16, regarding the estimated per pole survey costs. Provide detailed cost support for the estimated per pole survey cost of \$14.26 and provide support for all assumptions made in calculating that amount.

11. For Blue Grass Energy only: Refer to Blue Grass Energy's response to Commission Staff's First Request, Item 9. Explain what is meant by the birth year of a pole.

12. For Blue Grass Energy only: Refer to Blue Grass Energy's response to Commission Staff's First Request, Item 11.

a. Explain the timeline for replacing a pole that is identified as a "danger structure."

b. Explain the timeline for replacing a pole when it is scheduled for replacement in routine work scheduling when it is identified as unsatisfactory but not a "danger structure."

c. Explain how you keep track of when poles are inspected a 10-year inspection and how you track the condition of the pole at the time of inspection.

d. Other than the 10 year inspection described, state whether you conduct any other pole inspections, visual or otherwise, and if so, describe those inspections in detail, including how they are documented.

13. For Blue Grass Energy only: Refer to Blue Grass Energy's response to Staff's First Request, Item 16, regarding the estimated per pole survey costs. Provide detailed cost support for the estimated per pole survey cost of \$30.00 and provide support for all assumptions made in calculating that amount.

14. For Clark Energy only: Refer to Clark Energy's response to Commission Staff's First Request, Item 7. Provide the balance of account 108.60 – ACCUM PROV FOR DEP DIST PLANT at the end of each of the last five fiscal years.

15. For Clark Energy only: Refer to Clark Energy's response to Staff's First Request, Item 8. State whether the 25 years identified is the average remaining useful life or the average useful life of the poles.

16. For Clark Energy only: Refer to Clark Energy's response to Staff's First Request, Item 11.

a. Explain in detail what you do when you identify a defect with a pole as part of a 10-year inspection, including specifically when and under what circumstances you would replace a pole due to a defect.

b. Explain the timeline for replacing a pole when it is scheduled for replacement as part of normal work flow processes.

c. Explain how you keep track of when poles are inspected as part of a 10-year inspection and how you track the condition of the pole at the time of inspection.

d. Other than the 10-year inspection described, state whether you conduct any other pole inspections, visual or otherwise, and if so, describe those inspections in detail, including how they are documented.

17. For Clark Energy only: Refer to Clark Energy's response to Staff's First Request, Item 15, regarding the administrative review fee. Provide detailed support for the employee cost of \$44.56 and the assertion that the tasks associated with the administrative review fee take 2.25 hours of dedicated time to complete.

18. For Clark Energy only: Refer to Clark Energy's response to Staff's First Request, Item 16, regarding the estimated per pole survey costs. Provide detailed support for the field employee and truck expense of \$62.27.

19. For Cumberland Valley only: Refer to Cumberland Valley's response to Staff's First Request, Item 9.

a. State whether Cumberland Valley maintains any record of the number of poles in its system, and if so, provide the total number of poles.

b. State whether Cumberland Valley maintains record of when any poles are placed in service (e.g. has it started to do as recently as poles have been replaced). If so, provide any information Cumberland Valley has regarding when poles have been placed in service.

20. For Cumberland Valley only: Refer to Cumberland Valley's response to Staff's First Request, Item 11.

a. Explain in detail what you do when you identify a defect with a pole as part of a visual or 10-year inspection, including specifically when and under what circumstances you would replace a pole owned by Cumberland Valley due to a defect.

b. Provide the typical timeline for issuing a work order to replace a pole when a defect requiring replacement is identified.

c. Provide the typical timeline for replacing a pole once a work order is issued.

d. Explain how you keep track of when poles are inspected as part of a visual or 10-year inspection and how you track the condition of the pole at the time of inspection.

21. For Farmers RECC only: Refer to Farmers RECC's response to Staff's First Request, Item 9. Provide the number of poles installed and retired in each of the last 30 years.

22. For Farmers RECC only: Refer to Farmers RECC's response to Staff's First Request, Item 11.

a. Provide the typical timeline for replacing a pole when a defect requiring replacement is identified as part of an inspection.

b. Explain how you keep track of when poles are inspected and how you track the condition of the pole at the time of inspection.

23. For Farmers RECC only: Refer to Farmers RECC's response to Staff First Request, Item 16, regarding the estimated per pole survey costs.

a. Provide detailed support for the man hour labor cost of \$44.16.

b. Provide detailed support for the labor overhead rate of 54.38 percent.

c. Provide detailed support for the vehicle cost of \$10.26.

d. Provide support for the assertion that travel time per pole takes 0.5 hours.



24. For Fleming-Mason Energy only: Refer to Fleming-Mason Energy's response to Staff's First Request, Item 7. Provide the balance of account 108.61 at the end of each of the last five fiscal years.

25. For Fleming-Mason Energy only: Refer to Fleming-Mason Energy's response to Staff's First Request, Item 9. Provide the number of poles installed and retired in each of the last 30 years.

26. For Fleming-Mason Energy only: Refer to Fleming-Mason Energy's response to Staff's First Request, Item 11.

a. Provide the typical timeline for replacing a pole when a defect requiring replacement is identified as part of an inspection.

b. Explain how you keep track of when poles are inspected and how you track the condition of the pole at the time of inspection.

27. For Fleming-Mason Energy only: Refer to Fleming-Mason Energy's response to Staff's First Request, Item 16, regarding the estimated per pole survey costs.

a. Provide detailed support for the man hour cost of \$33.00 and the overhead cost of 75.46 percent.

b. Provide support for the assertion that travel time per pole takes 1.5 hours.

28. For Grayson RECC only: Refer to Grayson RECC's response to Staff's First Request, Item 9. Explain whether it is possible to tell that poles of "unknown age" were installed prior to a specific i.e. when Grayson RECC started keeping records of the date poles were placed in service.

29. For Grayson RECC only: Refer to Grayson RECC's response to Staff's First Request, Item 11.

a. Provide the typical timeline for replacing a pole after it is red tagged as described in this response.

b. State what percentage of yellow tagged poles are typically red-tagged for replacement upon the first 5-year re-inspection after being yellow-tagged.

30. For Grayson RECC only: Refer to Grayson RECC's response to Staff's First Request, Item 16, regarding the estimated per pole survey costs.

a. Provide detailed support for the man hour cost of \$38.39.

b. Provide detailed support for the overhead rate of 300 percent.

c. Provide support for the assertion that travel time per pole takes one hour.

31. For Inter-County Energy only: Refer to Inter-County Energy's response to Staff's First Request, Item 9. Explain whether it is possible to tell that poles of unknown age were installed prior to a specific date i.e. when Inter-County Energy started keeping records of the date poles were placed in service.

32. For Inter-County Energy only: Refer to Inter-County Energy's response to Staff's First Request, Item 11.

a. Explain in detail what you do when you identify a defect with a pole as part of a 10-year inspection, including specifically when and under what circumstances you would replace a pole you own due to a defect.

b. Provide the typical timeline for replacing a pole once a defect is identified.

c. Explain how the third party contractor communicates the results of any inspection to Inter-County Energy

d. Explain how you keep track of when poles are inspected as part of a 10-year inspection and how you track the condition of the pole at the time of inspection.

e. Other than the 10-year inspection described, state whether you conduct any other pole inspections, visual or otherwise, and if so, describe those inspections in detail, including how they are documented.

33. For Inter-County Energy only: Refer to Inter-County Energy's response to Staff's First Request, Item 16, regarding the estimated per pole survey costs.

a. Provide detailed support for the man hour cost of \$40.21.

b. Provide detailed support for the overhead rate of 92 percent.

c. Provide support for the assertion that travel time per pole takes one hour.

d. Provide detailed support for the vehicle cost of \$19.87 per hour.

34. For Jackson Energy only: Refer to Jackson Energy's response to Staff's First Request, Item 9. State whether Jackson Energy maintains record of when any poles are placed in service (e.g. has it started to do as recently as poles have been replaced). If so, provide any information Jackson Energy has regarding when poles have been placed in service.

35. For Jackson Energy only: Refer to Jackson Energy's response to Staff's First Request, Item 11.

a. Provide the typical timeline for replacing a pole when it is "given priority for replacement."

b. Provide the typical timeline for replacing a pole when it is flagged to be “replaced in the due course of maintenance work.”

c. Explain how you keep track of when poles are inspected and how you track the condition of the pole at the time of inspection.

36. For Jackson Energy only: Refer to Jackson Energy’s response to Staff’s First Request, Item 15, regarding the administrative review fee. Provide detailed cost support for the \$150 application review fee and provide support for all assumptions made in calculating that amount.

37. For Jackson Energy only: Refer to Jackson Energy’s response to Staff’s First Request, Item 16, regarding the estimated per pole survey costs. Provide detailed cost support for the estimated per pole survey cost of \$29.47 and provide support for all assumptions made in calculating that amount.

38. For Jackson Purchase Energy only: Refer to Jackson Purchase Energy’s response to Staff’s First Request, Item 11.

a. Provide the typical timeline for replacing a pole when it is determined to be “bad.”

b. Describe the circumstances under which a contractor would deem a pole to be bad.

c. State whether Jackson Purchase Energy replaces all poles its contractor identifies as being bad, and if not, describe how often and under what circumstances it would not replace poles deemed bad by a contractor.

d. Explain how you keep track of when poles are inspected and how you track the condition of the poles at the time of inspection.

39. For Jackson Purchase Energy only: Refer to Jackson Purchase Energy's response to Staff's First Request, Item 16, regarding the estimated per pole survey costs.

- a. Provide detailed support for the overhead rate of 205 percent.
- b. Provide support for the assertion that travel time takes one hour per pole.

40. For Kenergy Corp. only: Refer to Kenergy Corp.'s response to Staff's First Request, Item 11.

a. Provide the typical timeline for replacing a pole once a defect is identified.

b. Describe in detail the findings of an inspection that would result in the pole being replaced.

c. Explain how the third party contractor communicates the results of any inspection to Kenergy Corp.

d. Explain how you keep track of when poles are inspected as part of a 10-year inspection and how you track the condition of the pole at the time of inspection.

e. Other than the 10-year inspection described, state whether you conduct any other pole inspections, visual or otherwise, and if so, describe those inspections in detail, including how they are documented.

41. For Kenergy Corp. only: Refer to Kenergy Corp.'s proposed tariff PSC No. 2, Fifth Revised Sheet No. 76 (page 45), regarding the estimated per-pole survey cost. Explain what is included in the other cost based on regular labor worked amount of \$21.59.

42. For Licking Valley RECC only: Refer to Licking Valley RECC's response to Staff's First Request, Item 9. State whether Licking Valley RECC maintains record of when any poles are placed in service (e.g. has it started to do as recently as poles have been replaced). If so, provide any information Cumberland Valley has regarding when poles have been placed in service.

43. For Licking Valley RECC only: Refer to Licking Valley RECC's response to Staff's First Request, Item 11.

a. Explain in detail what you do when you identify a defect with a pole as part of an inspection, including specifically when and under what circumstances you would replace a pole you own due to a defect.

b. Describe in detail the findings of an inspection that would result in the pole being replaced.

c. Provide the typical timeline for replacing a pole when a defect requiring replacement is identified.

d. Provide the typical timeline for replacing a pole once a work order is issued.

e. Explain how you keep track of when poles are inspected and how you track the condition of the pole at the time of inspection.

44. For Licking Valley RECC only: Refer to Licking Valley's response to Staff's First Request, Item 16, regarding the estimated per pole survey costs.

a. Provide detailed support for the man hour cost of \$33.25.

b. Provide detailed support for the overhead rate of 40 percent.

c. Provide support for the assertion that for the application review, only one pole is reviewed per hour.

d. Provide support for the assertion that for the pre-construction and post-construction surveys, only one pole is reviewed per hour.

e. Provide support for the assertion that travel time takes one hour per pole.

f. Provide support for the assertion that the number of poles in a typical application is one.

45. For Meade County RECC only: Refer to Meade County RECC's response to Staff's First Request, Item 11.

a. Describe in detail how Meade County RECC conducts the pole inspections, including how often the inspector conducts inspections, what it does specifically as part of each such inspection, what the inspector does when they identify a defect with a pole, and each step thereafter.

b. Describe in detail the findings of an inspection that would result in the pole being replaced.

c. Provide the typical timeline for replacing a pole when a defect requiring replacement is identified.

d. Explain whether there is a follow-up process if a defect not requiring replacement is identified.

e. Explain in detail how you keep track of when poles are inspected and how you track the condition of the pole at the time of inspection.

46. For Meade County RECC only: Refer to Meade County RECC's response to Staff's First Request, Item 16, regarding the estimated per pole survey costs.

a. Provide detailed support for the labor and overhead cost of \$89.60 per hour.

b. Provide support for the assertion that the surveys take 15 minutes per pole.

47. For Nolin RECC only: Refer to Nolin RECC's response to Staff's First Request, Item 11.

a. Provide the typical timeline for replacing a pole when a defect requiring replacement is identified.

b. Explain how you keep track of when poles are inspected and how you track the condition of the pole at the time of inspection.

48. For Nolin RECC only: Refer to Nolin RECC's response to Staff's First Request, Item 16, regarding the estimated per pole survey costs. Provide detailed cost support for the estimated per pole survey cost of \$33.94 and provide support for all assumptions made in calculating that amount.

49. For Owen Electric only: Refer to Owen Electric's response to Staff's First Request, Item 9. Explain whether it is possible to tell that poles of unknown age were installed prior to a specific date i.e. when Owen Electric started keeping records of the date poles were placed in service.

50. For Owen Electric only: Refer to Owen Electric's response to Staff's First Request, Item 11. Provide the typical timeline for replacing a pole once a defect is identified.



51. For Owen Electric only: Refer to Owen Electric's response to Staff's First Request, Item 16, regarding the estimated per pole survey costs.

a. Provide detailed cost support for the estimated per pole survey cost of \$30 and provide support for all assumptions made in calculating that amount.

b. Explain why Owen Electric has proposed to establish a minimum survey charge of \$200.

52. For Salt River Electric only: Refer to Salt River Electric's response to Staff's First Request, Item 11.

a. Describe in detail how Salt River Electric conducts the 10-year pole inspections, including what the inspector does specifically as part of each such inspection, what the inspector does when they identify a defect with a pole, and each step thereafter.

b. Describe in detail the findings of an inspection that would result in the pole being replaced.

c. Provide the typical timeline for replacing a pole when a defect requiring replacement is identified.

d. Explain whether there is a follow-up process if a defect not requiring replacement is identified.

e. Explain in detail how you keep track of when poles are inspected and how you track the condition of the pole at the time of inspection.

f. Other than the 10-year inspection described, state whether you conduct any other pole inspections, visual or otherwise, and if so, describe those inspections in detail, including how they are documented

53. For Salt River Electric only: Refer to Salt River Electric's response to Staff's First Request, Item 11.

a. Provide the typical timeline for replacing a pole when a defect requiring replacement is identified.

b. Explain in detail how you keep track of when poles are inspected and how you track the condition of the pole at the time of inspection.

54. For Salt River Electric only: Refer to Salt River Electric's response to Staff's First Request, Item 16, regarding the estimated per pole survey costs. Provide detailed cost support for the estimated per pole survey cost of \$20.23 and provide support for all assumptions made in calculating that amount.

55. For Shelby Energy only: Refer to Shelby Energy's response to Staff's First Request, Item 16, regarding the estimated per pole survey costs. Provide detailed cost support for the estimated per pole survey cost of \$33.12 and provide support for all assumptions made in calculating that amount.

56. For South Kentucky RECC only: Refer to South Kentucky RECC's response to Staff's First Request, Item 11.

a. Provide the typical timeline for replacing a pole when a defect requiring replacement is identified.

b. Explain in detail how you keep track of when poles are inspected and how you track the condition of the pole at the time of inspection.

57. For South Kentucky RECC only: Refer to South Kentucky RECC's response to Staff's First Request, Item 16, regarding the estimated per pole survey costs.

a. Provide detailed support for the man hour cost of \$34.72.

- b. Provide detailed support for the overhead rate of 428 percent.
- c. Provide support for the assertion that travel time takes one hour per

pole.

58. For Taylor County RECC only: Refer to Taylor County RECC's response to Staff's First Request, Item 11.

- a. Provide the typical timeline for replacing a pole when a defect requiring replacement is identified.

- b. Explain in detail how you keep track of when poles are inspected and how you track the condition of the pole at the time of inspection.

59. For Taylor County RECC only: Refer to Taylor County RECC's response to Staff's First Request, Item 16, regarding the estimated per pole survey costs. Provide detailed support for the \$30 per pole estimate provided by the third party contractor and provide all assumptions made in calculating that amount.



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DATED   MAY 19 2022  

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