

January 10, 2005

Ms. Elizabeth O'Donnell  
Executive Director  
Public Service Commission of Kentucky  
211 Sower Boulevard  
Frankfort, KY 40601

**RECEIVED**  
JAN 11 2005  
PUBLIC SERVICE  
COMMISSION

Re: Case No. 2004-00319

Dear Ms. O'Donnell:

Enclosed please find for filing the original and ten (10) copies of the Kentucky Cable Telecommunication Association's First Information and Data Request to Jackson Purchase Energy Corporation.

Thank you for your attention to this matter.

Very truly yours,

WYATT, TARRANT & COMBS, LLP



Frank F. Chuppe

FFC/pw  
Enclosures  
20230717.1

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

RECEIVED  
JAN 11 2005  
PUBLIC SERVICE  
COMMISSION

In the Matter of:

APPLICATION OF JACKSON PURCHASE )  
ENERGY CORPORATION FOR ) Case No. 2004-00319  
ADJUSTMENTS IN EXISTING CABLE )  
TELEVISION ATTACHED TARIFF )

FIRST INFORMATION AND DATA REQUEST TO JACKSON PURCHASE  
ENERGY CORPORATION BY KENTUCKY CABLE TELECOMMUNICATIONS  
ASSOCIATION

The Kentucky Cable Telecommunications Association ("KCTA") , by counsel, submits the following information and data requests to Jackson Purchase Energy Corporation ("JPEC"). All responses and documentation requested are due on January 28, 2005, and should be sent by overnight mail to Gardner F. Gillespie, Hogan & Hartson, L.L.P., 555 13th Street, N.W., Washington, D.C. 20004.

1. Please provide all calculations and worksheets used to derive JPEC's proposed pole attachment and anchor rates.
2. Please provide JPEC's accumulated depreciation reserve for utility plant, as of YE 2003, and documentation of the amount.
3. Mr. Sherrill's prepared testimony, Response 6, states that the "net book value of the entire pole plant" is \$20,679,711. Please provide JPEC's accumulated depreciation reserve for Account 364, and documentation of the

amount. (If the amount is maintained in JPEC's records, please provide documentation; if the amount is derived, please show all calculations and documentation of the accounts used in the calculations.)

4. With regard to Sherrill Exhibit 2, please indicate all RUS "electric plant in service" accounts associated with Accounts 108.600 – 108.673. Among other things, indicate which of the 108.600 series of accounts contain accumulated depreciation associated with each of Accounts 362, 363, 364, 365, 366, 367, 368, 369 and 370.

5. Please provide a copy of JPEC's continuing property records for Accounts 364 and 365, in their entirety, for YE 2003, and for each sub account reflected indicate all items included in such sub account. (Please provide complete copies of both the print out for "Plant Distribution" for 12/31/03 and CPR Master File data as of YE 2003.)

6. Please explain fully JPEC's procedures for recording retirements in Accounts 364 and 365, and explain why no retirements are reflected in the "Plant Distribution" information other than in 2003.

7. Please describe fully all equipment and facilities that are contained in Account 365.261.

8. Does JPEC contend that KCTA's members attach to JPEC's grounding system on every pole?

9. If the answer to Data Request 8 is affirmative, please provide all evidence that demonstrates that KCTA's members actually attach to JPEC's grounding system on every pole.

10. Please explain fully JPEC's practices regarding placement of grounds on its distribution system.

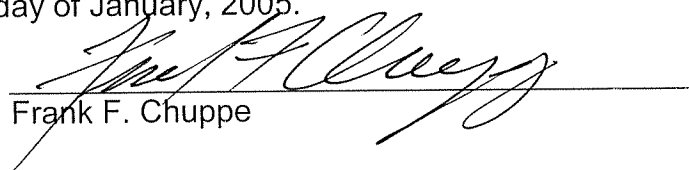
Respectfully submitted,

Gardner F. Gillespie  
Yaron Dori  
HOGAN & HARSTON, L.L.P.  
555 Thirteenth Street, N.W.  
Washington, DC 20004-1109

  
Frank F. Chuppe  
WYATT, TARRANT & COMBS, LLP  
500 West Jefferson Street, Suite 2600  
Louisville, KY 40202  
(502) 562-7336

### **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the foregoing was served upon Frank N. King, Jr., Dorsey, King, Gray, Norment & Hopgood, 318 Second Street, Henderson, KY 42420, John E. Selent and Holly C. Wallace, Dinsmore & Shohl, LLP, 1400 PNC Plaza, 500 West Jefferson Street, Louisville, KY 40202, and to the Attorney General of Kentucky, Office of Rate Intervention, 1024 Capital Center Drive, Frankfort, KY 40601 by U.S. Mail, first class postage prepaid, this 10th day of January, 2005.

  
Frank F. Chuppe