

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

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In the Matter of:

PUBLIC SERVICE
COMMISSION

ADJUSTMENT OF RATES)
OF CUMBERLAND VALLEY) CASE NO. 2005-00187
ELECTRIC, INC.)

ATTORNEY GENERAL'S SECOND AMENDED EMERGENCY MOTION TO
REQUEST SUBPOENAS ORDERING CERTAIN OF PETITIONER'S
EMPLOYEES TO SUBMIT TO DEPOSITIONS

* * * * *

Comes now the Attorney General, by counsel, and hereby moves the Commission to issue subpoenas to take the depositions of additional witnesses in this matter. Counsel's Second-Amended Schedule is attached hereto.

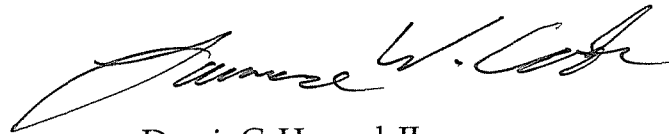
In support of this motion, counsel states that additional witnesses have now been discovered whose depositions must be taken prior to the hearing of this matter, currently scheduled for January 10, 2006. All four of these witnesses are either current or retired career employees of petitioner. The Office of the Attorney General has received allegations from confidential sources regarding imprudent, inappropriate spending of very substantial amounts authorized by petitioner's senior management. It is the Attorney General's belief that said witnesses possess knowledge regarding petitioner's spending practices that is relevant to the instant rate case. The Attorney General is charged by law with representing the interests of petitioner's ratepayers, and must review said allegations in order to determine the appropriateness of petitioner's rate request.

The Attorney General's Amended Schedule is attached hereto.

WHEREFORE, Counsel respectfully request that the Commission grant
this motion.

Respectfully submitted,

GREGORY D. STUMBO
ATTORNEY GENERAL

A handwritten signature in cursive script, appearing to read "Lawrence W. Cook".

Dennis G. Howard, II
Elizabeth E. Blackford
Lawrence W. Cook
Assistant Attorneys General
1024 Capital Center Drive, Suite 200
Frankfort, KY 40601-8204
502 696-5453

**ATTORNEY GENERAL'S SECOND AMENDED
DEPOSITION SCHEDULE**

NAME & ADDRESS	DATE	TIME	PLACE
Fred Bays, Jr. 513 Pitzer St. Barbourville, KY 40906	12-20-2005	8:30 a.m.	Knox County Public Library 206 Knox St. Barbourville, KY
Robert Prevatte 62 Sapphire Ln. Corbin, KY 40701	12-20-2005	9:30 a.m.	Knox County Public Library 206 Knox St. Barbourville, KY
Mike Baird Hwy. 25 E Gray, KY 40734	12-20-2005	11:00 a.m.	Knox County Public Library 206 Knox St. Barbourville, KY
Kenneth Wayne Bryant Hwy. 25 E Gray, KY 40734	12-20-2005	12:30 p.m.	Knox County Public Library 206 Knox St. Barbourville, KY
Ernest Deapan Hwy. 25 E Gray, KY 40734	12-20-2005	1:30 p.m.	Knox County Public Library 206 Knox St. Barbourville, KY
Mary Herren 305 Lynn Camp School Rd. Corbin, KY 40701	12-20-2005	2:30 p.m.	Knox County Public Library 206 Knox St. Barbourville, KY

Certificate of Service and Filing

Counsel certifies that an original and seven photocopies of the Attorney General's Motion to Request Subpoenas for Depositions were served and filed by hand delivery to Beth O'Donnell, Executive Director, Public Service Commission, 211 Sower Boulevard, Frankfort, Kentucky 40601; furthermore, it was served by mailing a true and correct copy of the same, first class postage prepaid, to

Ted Hampton
Cumberland Valley Electric, Inc.
P.O. Box 440
Gray, Kentucky 40734

Mr. Pat Houser
P.O. Box 1900
Barbourville, KY 40906

all on this 9th day of December, 2005.


Assistant Attorney General