

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

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PUBLIC SERVICE
COMMISSION

In the Matter of:

APPLICATION OF NOLIN RURAL ELECTRIC)
COOPERATIVE CORPORATION FOR AN) CASE NO. 2006-00466
ADJUSTMENT OF RATES)

ATTORNEY GENERAL'S SUPPLEMENTAL REQUESTS FOR INFORMATION

Comes now the intervenor, the Attorney General of the Commonwealth of Kentucky, by and through his Office of Rate Intervention, and submits these Supplemental Requests for Information to Nolin Rural Electric Cooperative Corporation ["NRECC"], to be answered by the date specified in the Commission's Order of Procedure, and in accord with the following:

- (1) In each case where a request seeks data provided in response to a staff request, reference to the appropriate request item will be deemed a satisfactory response.
- (2) Please identify the witness who will be prepared to answer questions concerning each request.
- (3) These requests shall be deemed continuing so as to require further and supplemental responses if the company receives or generates additional information within the scope of these requests between the time of the response and the time of any hearing conducted hereon.

(4) If any request appears confusing, please request clarification directly from the Office of Attorney General.

(5) To the extent that the specific document, workpaper or information as requested does not exist, but a similar document, workpaper or information does exist, provide the similar document, workpaper, or information.

(6) To the extent that any request may be answered by way of a computer printout, please identify each variable contained in the printout which would not be self evident to a person not familiar with the printout.

(7) If NRECC objects to any request on the grounds that the requested information is proprietary in nature, or for any other reason, please notify the Office of the Attorney General as soon as possible.

(8) For any document withheld on the basis of privilege, state the following: date; author; addressee; indicated or blind copies; all persons to whom distributed, shown, or explained; and, the nature and legal basis for the privilege asserted.

(9) In the event any document called for has been destroyed or transferred beyond the control of the company, please state: the identity of the person by whom it was destroyed or transferred, and the person authorizing the destruction or transfer; the time, place, and method of destruction or transfer; and, the reason(s) for its destruction or transfer. If destroyed or disposed of by operation of a retention policy, state the retention policy.

(10) Please provide written responses, together with any and all exhibits pertaining thereto, in one or more bound volumes, separately indexed and tabbed by each response.

Respectfully submitted,

GREGORY D. STUMBO
ATTORNEY GENERAL

A handwritten signature in black ink, appearing to read "Lawrence W. Cook", is written over a horizontal line.

LAWRENCE W. COOK
PAUL D. ADAMS
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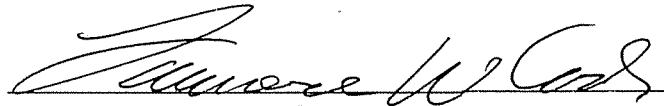
Certificate of Service and Filing

Counsel certifies that an original and ten photocopies of the foregoing were served and filed by hand delivery to Beth O'Donnell, Executive Director, Public Service Commission, 211 Sower Boulevard, Frankfort, Kentucky 40601; counsel further states that true and accurate copies of the foregoing were mailed via First Class U.S. Mail, postage pre-paid, to:

Michael L. Miller
President & CEO
Nolin R.E.C.C.
411 Ring Road
Elizabethtown, KY 42701-8701

Hon. John J Scott
Attorney at Law
Whitlow & Scott
P. O. Box 389
Elizabethtown, KY 42702

this 1st day of June, 2007


Assistant Attorney General

Attorney General's Supplemental Data Requests
Nolin RECC
Case No. 2006-00466

1. Please refer to NRECC's response to PSC 2-16 (c)(3). NRECC stated therein that expenses associated with an EEOC lawsuit, totaling \$2,901.44 are not recurring expenses. Does NRECC agree to exclude these costs from its revenue requirements?
2. Please refer to NRECC's response to PSC 2-16 (c)(4). NRECC stated therein that expenses totaling \$997.50 are nonrecurring. Does NRECC agree to exclude these costs?
3. With regard to NRECC's response to PSC 2-16 (C)(6), explain how the Mulligan complaint is a recurring expense. Why did NRECC spend \$575.50 on this complaint? Provide an accounting of the sums so expended.
4. Please refer to NRECC's response to AG 1-10. Provide the full amount of interest on customer deposits for the test year. Did NRECC remove interest on customer deposits from the rate base?
5. Please refer to NRECC's response to AG 1-6. Has NRECC ever conducted, or does it conduct, any business transactions with any of the following business entities with which the vice-chairman of NRECC's board of directors, Gene Straney, is associated:
 - a. G & P Construction
 - b. Straney & Burkhead
 - c. WGE LLC
 - d. Valley View Developers LLC
 - e. Bluegrass Developers of Hardin County LLC
 - f. Central Kentucky Properties LLC
6. If NRECC's response to question number 5, above, is "yes," provide details of the transaction including but not limited to dates, amount(s) transacted, nature of goods or services provided, and whether the transaction was the subject of a competitive bid process.
7. Please confirm the following expenses incurred with regard to attendance at meetings / conferences other than those attended by NRECC's delegate to the NRECA and KAEC annual meetings:
 - a. NRECA Regional Meeting: \$3782.12

- b. Strategic Issues Conference: \$1932.16
- c. NRECA Annual Meeting: \$10,028.67
- d. KAEC Annual Meeting: \$2684.28
- e. KAEC Director Training: \$2366.25
- f. NRECA Director Training: \$644.00
- g. NRECA Benefits Conference: \$4077.44
- h. NRECA Tech Advantage Seminar: \$2488.08
- i. NRECA NET Conference: \$2023.86
- j. "NRECA Conference": \$3198.43
- k. "NRECA Connect Conference": \$3252.29
- l. "NRECA Employee Meeting": \$1759.02
- m. "NRECA Finance Conference": \$949.62

TOTAL: \$39,125.06