

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

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**PUBLIC SERVICE
COMMISSION**

In the Matter of:

Notice of Big Rivers Electric Corporation of)
Change in Rates, and Joint Application of Jackson)
Purchase Energy Corporation, Kenergy Corp.) Case No.
and Meade County Rural Electric Cooperative) 2007-00126
Corporation to Change Rates to Reflect Change)
in Wholesale Rates)

ATTORNEY GENERAL'S INITIAL REQUEST FOR INFORMATION

Comes now the intervenor, the Attorney General of the Commonwealth of Kentucky, by and through his Office of Rate Intervention, and submits this Initial Request for Information to Big Rivers Electric Corporation, Jackson Purchase Energy Corporation, Kenergy Corporation, and Meade County Rural Electric Cooperative Corporation [hereinafter the "Joint Applicants"], 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 Joint Applicants receive or generate 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 the Joint Applicants object 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 Joint Applicants, 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 cursive script, appearing to read "Dennis G. Howard, II", is written over a horizontal line.

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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:

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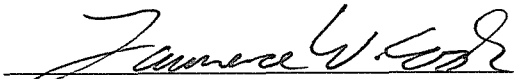
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this 1st day of May, 2007


Assistant Attorney General

Attorney General's Initial Data Requests
Big Rivers Rural Electric Corporation; Jackson Purchase
Energy Corporation; Kenergy Corporation; and Meade
County Rural Electric Cooperative Corporation
Case No. 2007-00126

1. Why did the Joint Applicants decide on a 1 year commitment for customers choosing to participate in the renewable resource energy program ["RREP"]? Could Joint Applicants consider giving smaller retail customers such as residentials the right to withdraw at any time? Why do they have to remain in for at least one full year?
2. For how long is Weyerhaeuser committed to making its biomass-generated electricity available to BREC customers?
3. In the event Weyerhaeuser withdraws from the agreement, will the Joint Applicants withdraw the proposed tariffs, or would they consider going to some sort of green energy certificate program modeled after the program being instituted by LG&E and KU in Case No. 2007-00067?
4. Please provide a schedule of the administrative charges that each of the Joint Applicants anticipate incurring as a result of administering the program, and identify specifically how each Joint Applicant will attempt recovery of such costs.
 - a. Will Joint Applicants themselves be in charge of administering the program, or will a third party be performing any portion thereof?
 - b. Will administrative and other costs of the RREP program be passed on to all ratepayers (even those not participating in the program)? Please provide a schedule of the expected reimbursement per rate class.
 - c. Will costs be treated as above the line, subject to recovery in the next rate case? If so, will Joint Applicants create a deferred account or regulatory asset from which they could seek cost recovery in any future rate cases?
 - d. Will Meade County RECC and Jackson Purchase RECC seek recovery of any costs associated with the RREP in their pending rate cases (2006-00500 and 2007-00116, respectively)?

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5. How will customer purchases under the RREP be treated for billing purposes (e.g., as a line item on the bill)?
6. If the RREP is approved, would Joint Applicants be willing to provide periodic accounting updates on participation levels, and such other information as the Commission may deem appropriate?
7. Joint Applicants have stated in their application that they will not be earning any additional margin on this product. How much margin will Weyerhaeuser be earning?
8. Have Joint Applicants conducted any pricing studies of programs similar to the RREP? If so, where does the price for participation in the proposed RREP program lie with regard to average prices elsewhere?