

**COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION**

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In the Matter of:

OCT 24 2008

**THE APPLICATIONS OF BIG RIVERS)
ELECTRIC CORPORATION FOR:)
(I) APPROVAL OF WHOLESALE TARIFF)
ADDITIONS FOR BIG RIVERS ELECTRIC)
CORPORATIONS, (II) APPROVAL OF)
TRANSACTIONS. (III) APPROVAL TO ISSUE)
EVIDENCES OF INDEBTEDNESS, AND)
(IV) APPROVAL OF AMENDMENTS TO)
CONTRACTS; AND)**

PUBLIC SERVICE
COMMISSION

) **CASE NO. 2007-00455**

**OF E.ON U.S., LLC, WESTERN KENTUCKY)
ENERGY CORP. AND LG&E ENERGY MARKETING,)
INC. FOR APPROVAL OF TRANSACTIONS)**

**ATTORNEY GENERAL'S SUPPLEMENTAL REQUESTS FOR INFORMATION
TO MEMBER COOPERATIVES**

Comes now the intervenor, the Attorney General of the Commonwealth of Kentucky, by and through his Office of Rate Intervention, and submits his Supplemental Requests for Information to Kenergy Corp., Jackson Purchase Energy Corporation, and Meade County Rural Electric Cooperative 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.

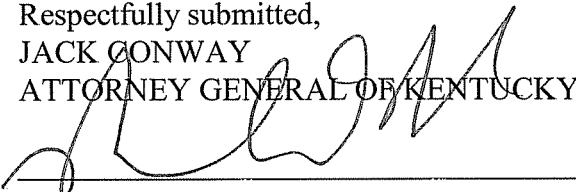
(6) To the extent that any request may be answered by way of a computer printout, please identify each variable contained in the printout which would not be self evident to a person not familiar with the printout.

(7) If the company has objections 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.

Respectfully submitted,
JACK CONWAY
ATTORNEY GENERAL OF KENTUCKY



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CERTIFICATE OF SERVICE AND NOTICE OF FILING

I hereby give notice that this the 24th day of October, 2008, I have filed the original and ten copies of the foregoing Attorney General's Supplemental Requests for Information to Member Cooperatives with the Kentucky Public Service Commission at 211 Sower Boulevard, Frankfort, Kentucky, 40601 and certify that this same day I have served the parties by mailing a true copy of same, postage prepaid, to those listed below.

C. William Blackburn
Big Rivers Electric Corporation
P. O. Box 24
Henderson, KY 42420

David Brown
Stites & Harbison, PLLC
1800 Providian Center
400 West Market Street
Louisville, KY 40202

Honorable John N. Hughes
124 West Todd Street
Frankfort, KY 40601

Honorable Frank N. King, Jr.
Dorsey, King, Gray, Norment & Hopgood
318 Second Street
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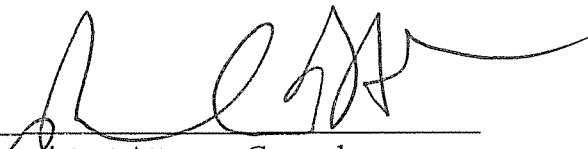
Honorable Michael L. Kurtz
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36 East Seventh Street Suite 1510
Cincinnati, OH 45202

Honorable James M. Miller
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Honorable Allyson K. Sturgeon
E.ON U.S. Services, Inc.
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Assistant Attorney General

ATTORNEY GENERAL'S SUPPLEMENTAL REQUEST FOR INFORMATION
Case No. 2007-00455

1. Please update responses to all previous data requests from the Office of Attorney General with any additional responsive documents and information since the date of the last response to such data requests. If no update exists for a specific question, the responses indicating that fact can be grouped in a joint response.
2. Please state whether or not any further agreements or understandings exist between the member cooperatives and any other party or entity regarding the proposed transaction which have not been explicitly identified or presented to the Commission which could be construed or understood as a "side deal" as that term is commonly understood. If any such "side deal" does exist, identify each one and describe it in detail.
3. Please quantify the amount of additional equity capital which the member cooperatives currently could invest in BREC, and the source of such additional equity capital from the member cooperatives.
4. Please provide a comparison of an average bill for a residential consumer in the member cooperative service area in 2009 (assuming modeled BREC rates) to most current average bills for residential consumers in the service areas of other regulated retail electric providers in Kentucky.
5. Describe and quantify how revisions to the Smelter Agreements accomplish "final resolution between Kenergy Corp. and the Smelters regarding certain patronage capital matters." (Second Supplemental Testimony of C. William Blackburn, at page 4.)