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JUL 5 2013

PUBLIC SERVICE
COMMISSION

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

FRANK McANINCH)	
)	
COMPLAINANT)	
)	
v.)	CASE NO. 2013-00165
)	
TAYLOR COUNTY RURAL ELECTRIC)	
COOPERATIVE CORPORATION)	
)	
DEFENDANT)	

**DEFENDANT’S FIRST SET OF REQUESTS
FOR INFORMATION PROPOUNDED TO COMPLAINANT**

Defendant, Taylor County Rural Electric Cooperative Corporation, acting by counsel and consistent with the Commission’s Order entered herein on June 17, 2013, propounds to Complainant, Frank McAninch, the following requests for information:

REQUEST NO. 1: Please state Complainant’s educational and vocational background, including all degrees, certificates and licenses held, as well as Claimant’s employment history for the last five years.

RESPONSE:

REQUEST NO. 2: Please identify by name(s) and address(es) the owner(s) of that property for which the service described in the Complaint is sought; and state the date and recording information (Deed Book, Page Number) of all Deeds of conveyance by means of which title to that property has been vested in that current owner(s).

RESPONSE:

REQUEST NO. 3: If the subject property is owned and/or operated by any legal entity other than an individual(s) please indicate:

A. If own by a trust, please identify the name of the trust and the names and addresses of the settlor(s) of the trust, the trustee(s), and all beneficiaries thereunder. Please provide a copy of any written document(s) establishing / governing that trust.

B. If owned by a partnership, please identify the names and addresses of all partners, and provide a copy of any written partnership agreement.

C. If owned by a business corporation, please identify the correct corporate name, the county in which that corporation was established, and names and address of all officers and shareholders. Please provide a copy of the corporation's Articles of Incorporation, as amended, and current by-laws.

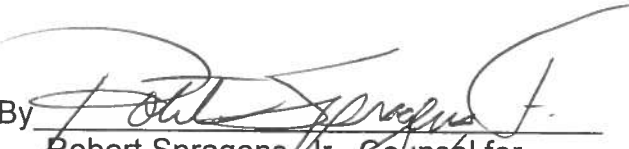
D. If owned by a limited liability company, please identify the name of such company and the names and addresses of all members, designating any managing member(s). Please provide a copy of that entity's current operating agreement.

RESPONSE:

REQUEST NO. 4: With respect to the business operations carried out upon the subject property, disclose for the calendar or fiscal years 2010, 2011 and 2012, the total income derived from the sale of lumber and custom sawing. Please provide copies of 2010, 2011 and 2012 federal and state tax returns which include the sawmill income, such returns to be properly redacted so as to obscure the identifying number of the entity filing such returns.

RESPONSE:

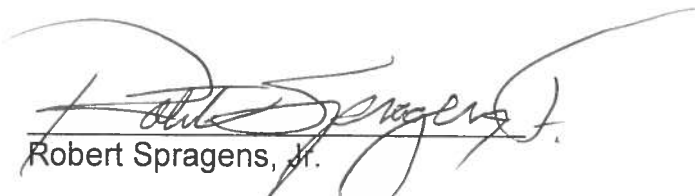
SPRAGENS & HIGDON, P.S.C.
Attorneys at Law
15 Court Square - P. O. Box 681
Lebanon, Kentucky 40033
Telephone (270) 692-3141

By 
Robert Spragens, Jr., Counsel for
Taylor County Rural Electric
Cooperative Corporation

I hereby certify that a true copy of
the foregoing was mailed this 3RD
day of July, 2013, to:

Frank McAninch
1341 Ivan Godbey Rd.
Liberty, KY 42539
Complainant

Mr. Jeff Derouen, Executive Director
Kentucky Public Service Commission
211 Sower Boulevard
P.O. Box 615
Frankfort, KY 40602
(Eight Copies)


Robert Spragens, Jr.