

CASE NO. 2013-00165

Frank McAninch

V.

Taylor County RECC

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PUBLIC SERVICE
COMMISSION

Complainant Supplemental Request for Information

1. What is the KRS definition of a farmer?
2. What is the KRS definition of a farm product?
3. Is lumber a farm product?
4. Is Frank McAninch a farmer?
5. Why do you want to see Frank McAninch's State and Federal Income Tax returns for the last three years?
6. What was the Master Settlement between the States and the Major Tobacco Companies?
7. What did the Commonwealth of Kentucky do with half of their Master Settlement money?
8. What is the intent of HB 611, which created The Governors Department of Agriculture Policy and The Agriculture Development Board?
9. Did the creation of the State Ag. Development Board and County Ag Development County Councils have a mission?
10. What was that Mission?
11. Did the State Ag. Development Board create programs to help farmers?
12. What type of farmers?
13. What type of programs?
14. Were any of the programs created to help farmers diversify their farm operations from tobacco?
15. What are County Agriculture Incentive Programs?
16. What incentive did the programs give farmers?
17. Was Silva Culture (on farm timber and lumber production) mentioned in the diversification program?
18. What can a farmer receive cost share on when participating in the CAIP Diversification program?
19. Was it the intent of Commonwealth of Kentucky to help tobacco farmers like Frank McAninch diversify their farming operations away from tobacco?
20. How does the United States Department of Agriculture keep tract of farms?
21. Does Marshall and Vivien McAninch have a Farm number, if so what is it?
22. Does Frank McAninch have a FSA Farm Number, If yes what is it, if not why not?
23. Where in the Taylor County RECC Tariff does it state you must own property to receive an electric service?

24. How many services does Frank McAninch have with the TC-RECC and where are they located?
25. How long has Frank McAninch been a member of the TC-RECC?
26. How many services do Marshall and Vivien McAninch have with TC-RECC and where are they located?
27. The Taylor County RECC tariff under the section dealing with Mobile homes list saw mills, billboards, and oil wells as questionably permanent, when was this section of the tariff written?
28. Was this an amendment to the tariff? If so, when?
29. What was the reason for the amendment?
30. Did the Taylor County RECC Board of Directors vote on the tariff amendment?
31. Please send me a copy of the minutes from the meeting when the tariff concerning line removal charges was voted on and any discussion from the meeting?
32. The tariff states the line removal charge may be subject to be but not limited to saw mills, billboards, and oil wells. What other business or types of services may the removal charge be applied to? Give me some other examples?
33. What is the written policy in determining who pays the removal charge?
34. Who and how was it determined that Frank McAninch should pay removal charge?
35. Please provide minutes from the meeting when this decision was made.
36. How many sawmills does the Taylor county RECC serve and what are their addresses?
37. How many of these sawmills have been charged a removal fee?
38. Were these asked to show three years of tax returns? If not why not?
39. Were these applicants asked to submit a copy of the deed where the service was to be located? If not why not?
40. How many lines poles services have been removed, please provide names of member and addresses?
41. How many billboards does Taylor County RECC serve, please provide member names, addresses and locations?
42. Were these members asked to submit tax returns? If not why not?
43. Were these applicants asked to submit a copy of the deed where the billboard was located? If not why not?
44. How many billboard services paid a removal charge?
45. How many services to billboards have been physically removed?
46. How many oil wells do the Taylor County RECC provide service to? Please provide member names, addresses and location.
47. Were these members asked to submit tax returns? If not why not?
48. Were these members asked to submit deeds where oil wells were located? If not why not?
49. How many oil wells have been charged a removal service?
50. How many services have been removed? Give Member name, address and location.
51. List all services where the member was asked to submit tax records and deeds to properties where services were located?

52. How many General Purpose services does the TC-RECC provide? How many of these are farm services?
53. How many of these services have been removed? Please provide member name, address, and location.
54. How many residential services does the TC-RECC provide?
55. How many residential services were terminated by the Taylor County RECC last year?
56. Why were they terminated?
57. How many had their service lines removed?
58. How many Taylor County RECC services were canceled, abandoned or destroyed?
59. How many of those services were removed? Not just the meter pulled but actually removed?
60. What was the net income of Taylor County RECC for each of the last three years?
61. What is the contract rate the Taylor County RECC pays for legal counsel to Spragens & Higdon, P.S.C. Attorneys at Law?