COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

RUSSELL MURPHY, JR.

COMPLAINANT

V.

CASE NO. 2014-00106

INTER-COUNTY ENERGY COOPERATIVE CORPORATION

DEFENDANT

COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION TO INTER-COUNTY ENERGY COOPERATIVE CORPORATION

Inter-County Energy Cooperative Corporation ("Inter-County"), pursuant to 807 KAR 5:001, is to file with the Commission the original and nine copies of the following information, with a copy to all parties of record. The information requested herein is due on or before August 8, 2014. Responses to requests for information shall be appropriately bound, tabbed, and indexed. Each response shall include the name of the witness responsible for responding to the questions related to the information provided.

Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association or a governmental agency, be accompanied by a signed certification of the preparer or person supervising the preparation of the response on behalf of the entity that the response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry. Inter-County shall make timely amendment to any prior responses if it obtains information which indicates that the response was incorrect when made or, though correct when made, is now incorrect in any material respect. For any requests to which Inter-County fails or refuses to furnish all or part of the requested information, it shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention should be given to copied material to ensure that it is legible. When the requested information has been previously provided in this proceeding in the requested format, reference may be made to the specific location of that information in responding to this request.

1. Refer to Inter-County's response to Staff's Initial Request for Information, Item 4.c. The question requested that Inter-County provide the Customer Average Interruption Duration Index ("CAIDI") data for Circuit #3 of the Peyton Store Substation for the years 2005–2013. Inter-County's response provided only the CAIDI data for the years 2005–2008.

a. Provide the CAIDI data as originally requested for the years 2009 –
2013.

b. In an Excel spreadsheet with all formulas and cells intact and unprotected, provide the supporting calculations made to arrive at each year's CAIDI data for the years 2005 – 2013.

c. As was done in the Answer, provide the circuit ranking associated with the CAIDI data for Circuit #3 of the Peyton Store Substation for the years 2005 – 2013.

Case No. 2014-00106

-2-

2. Refer to Inter-County's responses to Staff's Initial Request for Information, Items 4.a. and 4.c.

a. Confirm that the values of the responses are measured in minutes.

b. If such is confirmed, explain why the values were measured in minutes rather than in hours.

3. Provide a copy of the circuit map for Circuit #3 of the Peyton Store Substation and identify the distance from this substation to Complainant's residence and the number of customers served on this circuit.

aron to Drumwlel for

Jeff Derouen Executive Director Public Service Commission P.O. Box 615 Frankfort, KY 40602

JUL 1 8 2014

cc: Parties of Record

J. Hadden Dean Sheehan Barnett Dean Pennington Little & Dexter 116 North Third Street P.O. Box 1517 Danville, KENTUCKY 40423

James L Jacobus President & CEO Inter-County Energy Cooperative Corporation 1009 Hustonville Road P. O. Box 87 Danville, KY 40423-0087

Russell Murphy, Jr. 1660 N. Wallace Wilkinson Blvd. Liberty, KENTUCKY 45239

Ed Staton VP - State Regulation and Rates Kentucky Utilities Company 220 W. Main Street P. O. Box 32010 Louisville, KY 40202