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ATTORNEYS

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JAN 14 2005

PUBLIC SERVICE
COMMISSION

January 14, 2005

via Hand Delivery

Ms. Beth O'Donnell
Executive Director
Kentucky Public Service Commission
211 Sower Blvd.
P. O. Box 615
Frankfort, KY 40601

Re: Application of Jackson Purchase Energy Corporation for Adjustments in Existing Cable Television Attachment Tariff, before the Public Service Commission of the Commonwealth of Kentucky, Case No. 2004-00319

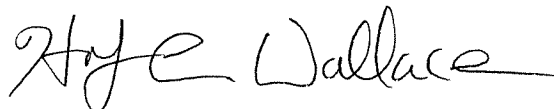
Dear Ms. O'Donnell:

Enclosed for filing with the Public Service Commission of the Commonwealth of Kentucky (the "Commission") is one original and ten (10) copies of Ballard Rural Telephone Cooperative Corporation Inc.'s Request for Production of Documents and Information and Data Requests in the above-styled case.

Thank you, and if you have any questions with regard to this matter, please call me.

Very truly yours,

DINSMORE & SHOHL LLP



Holly C. Wallace

HCW/rk

Enclosures

RECEIVED

JAN 14 2005

PUBLIC SERVICE
COMMISSION

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF JACKSON PURCHASE)
ENERGY CORPORATION FOR)
ADJUSTMENTS IN EXISTING CABLE)
TELEVISION ATTACHMENT TARIFF)

Case No. 200

ORIGINAL

(1) REQUEST FOR PRODUCTION OF DOCUMENTS
AND
(2) INFORMATION AND DATA REQUESTS

Ballard Rural Telephone Cooperative Corporation, Inc. ("Ballard Rural"), by counsel, hereby submits the following: (1) Requests for Production of Documents and (2) Information and Data Requests to Jackson Purchase Energy Corporation ("Jackson Purchase") pursuant to the procedural schedule ordered by the Public Service Commission of the Commonwealth of Kentucky (the "Commission") in this matter on or about December 16, 2004.

REQUESTS FOR PRODUCTION OF DOCUMENTS

REQUEST NO. 1:

Please produce any and all documents which evidence, relate, or refer to line items 3, 4, 5, or 6 in Exhibit 3 to Richard Sherrill's testimony filed with Jackson Purchase's application in the above-referenced matter on or about November 15, 2004.

RESPONSE:

REQUEST NO. 2:

Please produce any and all documents which evidence, relate, or refer to the return on investment permitted in Jackson Purchase's last general rate case.

RESPONSE:

REQUEST NO. 3:

Please produce any and all documents which evidence, relate, or refer to the embedded class cost of service study filed by Jackson Purchase with its last general rate case.

RESPONSE:

REQUEST NO. 4:

Please produce any and all documents which evidence, relate, or refer to the 18% depreciated pole plant claimed by Jackson Purchase.

RESPONSE:

REQUEST NO. 5:

Please produce any and all documents which evidence, relate or refer to the multiplier of .95 used to adjust pole account values as identified in Exhibit 2 to Jackson Purchase's application.

RESPONSE:

REQUEST NO. 6:

Please produce any and all documents which evidence, relate or refer to the \$33.08 grounding costs added to the bare pole costs as identified in Exhibit 2 to Jackson Purchase's application.

RESPONSE:

REQUEST NO. 7:

Please produce any and all documents, including but not limited to worksheets, which evidence, relate or refer to Jackson Purchase's proposed pole attachment and anchor rates.

RESPONSE:

REQUEST NO. 8:

Please produce any and all documents which evidence, relate or refer to Jackson Purchase's accumulated depreciation reserve for utility plant as of the year end 2003.

RESPONSE:

REQUEST NO. 9:

Please produce any and all documents which evidence, relate or refer to Jackson Purchase's accumulated depreciation reserve for Account 364 including, but not limited to, any documents used in calculating the accumulated depreciation for reserve account 364.

RESPONSE:

REQUEST NO. 10:

Please produce any and all documents which evidence, relate or refer to Jackson Purchase's continuing property records for Accounts 364 and 365 in their entirety, for year end 2003, and for each subaccount reflected indicate all items included in such subaccount. (Please provide complete copies of both the print out for "plant distribution" 12/31/03 and CPR Master File data as of year end 2003.)

RESPONSE:

INFORMATION AND DATA REQUESTS

REQUEST NO. 11:

Please provide a detailed explanation of all calculations used to derive Jackson Purchase's proposed pole attachment and anchor rates.

RESPONSE:

REQUEST NO. 12:

Please provide a detailed explanation of Jackson Purchase's accumulated depreciation reserve for utility plant, as of year end 2003.

RESPONSE:

REQUEST NO. 13:

Mr. Sherrill's prepared testimony, Response 6, states that the "net book value of the entire pole plant" is \$20,669,711. Please provide a detailed explanation of Jackson Purchase's accumulated depreciation reserve for Account 364 and the calculations used to derive the amount identified.

RESPONSE:

REQUEST NO. 14:

Does Jackson Purchase contend that Ballard Rural attaches to Jackson Purchase's grounding system on every pole?

RESPONSE:

REQUEST NO. 15:

If the answer to data request 14 is affirmative, please provide all evidence that demonstrates that Ballard Rural actually attaches to Jackson Purchase's grounding system on every pole.

RESPONSE:

REQUEST NO. 16:

Please provide a detailed explanation of Jackson Purchase's practices regarding placement of grounds on its distribution system.

RESPONSE:

REQUEST NO. 17:

Please provide a detailed comparison of the rate of return used in the carrying charge calculation, as identified in Exhibit 3 to Richard Sherrill's testimony and Exhibit 2 to Jackson Purchase's application, and the return on investment permitted in Jackson Purchase's last general rate case.

RESPONSE:

REQUEST NO. 18:

Please provide a detailed explanation of how Jackson Purchase calculated the figure of 18% depreciated pole plant claimed by Jackson Purchase.

RESPONSE:

REQUEST NO. 19:

Please provide a detailed explanation of why Jackson Purchase uses a multiplier of .95 as identified in Exhibit 2 to its application instead of .85 in accordance with Administrative Case No. 251.

RESPONSE:

REQUEST NO. 20:

Please provide a detailed explanation of why Jackson Purchase adds grounding costs to its bare pole costs as identified in Exhibit 2 of its application instead of subtracting ground costs from bare pole costs in accordance with Administrative Case No. 251.

RESPONSE:

REQUEST NO. 21:

Please provide a detailed explanation of how Jackson Purchase calculated ground costs in the amount of \$33.08 as identified in Exhibit 2 to Jackson Purchase's application.

RESPONSE:

REQUEST NO. 22:

Please identify in which account ground costs are now included if they are no longer included in Jackson Purchase's pole accounts as they were in 1984, and please provide the detail and entries made on the books to transfer ground costs originally included in pole accounts to the accounts in which ground costs are now contained.

RESPONSE:

REQUEST NO. 23:

Please identify in detail each time Jackson Purchase deviated from the methodology established in Administrative Case No. 251 when calculating the proposed cable television attachment tariff rates in its application.

RESPONSE:

REQUEST NO. 24:

With regard to Exhibit 2 to Richard Sherrill's testimony, please indicate all RUS "electric plant in service" accounts associated with Accounts 108.600 - 108.673. Among other things, indicate which of the 108.600 series of accounts contain accumulated depreciation associated with each of Accounts 362, 363, 364, 365, 366, 367, 368, 369 and 370.

RESPONSE:

REQUEST NO. 25:

Please explain fully Jackson Purchase's procedures for recording retirements in Accounts 364 and 365, and explain why no retirements are reflected in the "Plant Distribution" information other than in 2003.

RESPONSE:

REQUEST NO. 26:

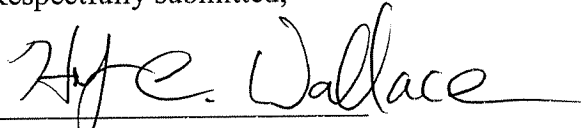
Please describe fully all equipment and facilities that are contained in Account 365.261.

RESPONSE:

REQUEST NO. 27:

Please identify when Jackson Purchase had its last general rate case, and please identify the corresponding case number assigned by the Public Service Commission of the Commonwealth of Kentucky.

Respectfully submitted,

A handwritten signature in black ink that reads "John E. Selent". The signature is written in a cursive style and is positioned above a horizontal line.

John E. Selent

Holly C. Wallace

DINSMORE & SHOHL LLP

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Louisville, KY 40202

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**Counsel to Ballard Rural Telephone
Cooperative Corporation, Inc.**

CERTIFICATE OF SERVICE

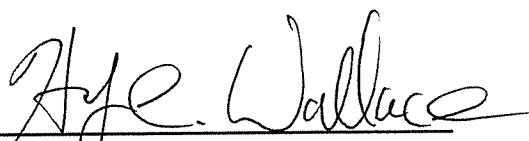
It is hereby certified that a true and accurate copy of the foregoing was served via First Class United States Mail, postage prepaid, to the following individuals this 14th day of January, 2005:

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**COUNSEL TO BALLARD RURAL
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CORPORATION, INC.**