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

In the Matter of:

# **APPLICATION OF FLEMING-MASON**

**ENERGY COOPERATIVE CORPORATION** FOR AN ADJUSTMENT OF RATES

) CASE NO. 2007-00022 )

RECEVED

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PUBLIC SERVICE COMMISSION

# ATTORNEY GENERAL'S SUPPLEMENTAL REQUESTS FOR INFORMATION

Comes now the intervenor, the Attorney General of the Commonwealth of Kentucky, by and through his Office of Rate Intervention, and submits the following Supplemental Requests for Information to Fleming-Mason Energy Cooperative Corporation ["FMECC"], 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.

If any request appears confusing, please request clarification directly from (4) 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 FMECC objects 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.

(10) Please provide written responses, together with any and all exhibits pertaining thereto, in one or more bound volumes, separately indexed and tabbed by each response.

(11) Each response should restate the request posed in its entirety and should answer the request in complete sentences.

Respectfully submitted,

GREGORY D. STUMBO DENNIS G. HOWARD, II I

PAUL D. ADAMS ASSISTANT ATTORNEYS GENERAL 1024 CAPITAL CENTER DRIVE, SUITE 200 FRANKFORT KY 40601-8204 (502) 696-5453 FAX: (502) 573-8315

## **Certificate of Service and Filing**

Counsel certifies that an original and ten photocopies of the foregoing were served and filed by hand delivery to Beth O'Donnell, Executive Director, Public Service Commission, 211 Sower Boulevard, Frankfort, Kentucky 40601; counsel further states that true and accurate copies of the foregoing were mailed via First Class U.S. Mail, postage pre-paid, to:

Chris Perry President and CEO Fleming-Mason Energy Cooperative P. O. Box 328 Flemingsburg, KY 41041

Hon. Marvin W Suit Attorney At Law Suit, McCartney & Price, PLLC 207 Court Sq. Flemingsburg, KY 41041

this 9<sup>th</sup> day of October, 200

Assistant Attorney General

## Attorney General's Supplemental Data Requests Fleming-Mason Energy Cooperative Corp. Case No. 2007-00022

1. With regard to the sale of Fleming Mason Services, please provide the following information:

- a. Please provide details concerning the status of the sale;
- b. Please identify the buyer;
- c. Please provide information on when the sale occurred;
- d. Please provide details concerning the sale price;

e. Please explain whether the \$750,000 loan from NCSC been paid back with the proceeds from the sale? If not, why not. If so, provide proof.

d. What was the loan amount from Fleming Mason Energy to Fleming Mason

Services at the time of the sale? Has this loan been paid back to Fleming Mason

Energy from the proceeds of the sale? If not, why not. If so, provide proof.

2. Why is Kentucky Wireless still on the books of Fleming Mason Energy? What is the purpose of this subsidiary? What is the amount of expenses that are incurred on an annual basis to have this subsidiary and who pays for these expenses?

3. Please provide the actual annual Acct. 583 - Overhead Line expenses for the operating years 2002, 2003, and 2004.

4.Please provide the actual annual Acct. 595 - Transformer expenses for the operating years 2002, 2003, and 2004.

5.Please provide the actual annual Acct. 904 - Uncollectible expenses for the operating years 2002, 2003, and 2004.

6. Please provide the actual annual Acct. 923 expenses for 2002, 2003 and 2004

7. Please provide the actual hydro plant study expenses included in the 2006 test year Acct. 923 expense. Please explain whether the company believes the expenses associated with this study are non-recurring.