

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

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JUL 28 2008

PUBLIC SERVICE
COMMISSION

IN THE MATTER OF)
ADJUSTMENT OF RATES)
OF BLUE GRASS ENERGY)
COOPERATIVE CORPORATION) NO. 2008-00011

Applicant, Blue Grass Energy Cooperative Corporation, submits the attached requests for information to the intervenor, Attorney General of the Commonwealth of Kentucky to be answered in accordance with the schedule determined by the Public Service Commission and in accordance with the following:

- (1) In each case where a request seeks data provided in response to a 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) Please repeat the question to which each response is intended to refer.
- (4) These requests shall be deemed continuing so as to require further and supplemental responses if the intervenor 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.
- (5) Each response shall be answered under oath and 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.
- (6) If any request appears confusing, please request clarification directly from applicant's

attorney or Donald Smothers of Blue Grass Energy.

(7) 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.

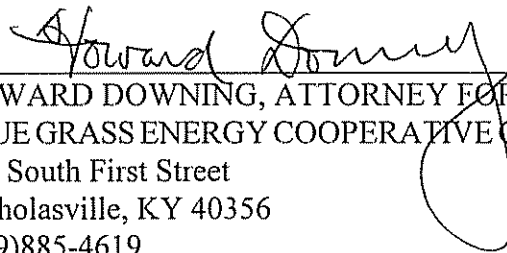
(8) To the extent that any request may be answered by way of a computer printout, please identify each variable contained in the printout which would not be self evident to a person not familiar with the printout.

(9) 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.

(10) In the event any document called for has been destroyed or transferred beyond the control of the intervenor, 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.

(11) 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.

Respectfully submitted;



HOWARD DOWNING, ATTORNEY FOR
BLUE GRASS ENERGY COOPERATIVE CORPORATION
109 South First Street
Nicholasville, KY 40356
(859)885-4619
FAX: (859)885-1127

CERTIFICATE OF SERVICE

The undersigned counsel certifies that the foregoing motion has been served upon the following:

Ms. Stephanie Stumbo
Executive Director
Kentucky Public Service Commission
211 Sower Boulevard
Frankfort, KY 40601

Copy

Hon. Lawrence W. Cook
Assistant Attorney General
1024 Capital Center Drive, Suite 200
Frankfort, KY 40601-8204

Leigh and Troy Roach
115 Prestwick Drive
Georgetown, KY 40324

This ___ day of July, 2008.



ATTORNEY FOR BLUE GRASS ENERGY
COOPERATIVE CORPORATION

**Blue Grass Energy Cooperative's Initial Data Requests
In regards to the Direct Testimony of Glenn A. Watkins
on behalf of the Kentucky Office of the Attorney General
Case No. 2008-00011**

1. Provide copies of Schedules 2, 3, and 4 of the Direct Testimony of Glenn A. Watkins electronically on CD-ROM in Microsoft Excel 1997-2003 format with uall formulas and schedules intact and unprotected.
2. Reference page 11, lines 27-29 and page 12, lines 1-4. Provide the workpapers that provide support for customer percentage of 25.09% including all data, all formulas and results.
3. Explain why the customer related costs for the below listed functions are not included in the \$8.75 customer charge proposed by Mr. Glenn. Address each function independent of the others.
 - Lines
 - Transformers
 - Customer services
 - Customer accounting
4. Provide a separate schedule that provides breakdown of the demand-related, the customer-related and the energy-related costs for each one of the original rate classes and the proposed consolidated rate classes. Attached are formats for the requested data.

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