

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

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COMMISSION

In the Matter of:

APPLICATION OF LICKING VALLEY RURAL)
ELECTRIC COOPERATIVE CORPORATION) CASE NO. 2009-00016
FOR AN ADJUSTMENT OF RATES)

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 these Supplemental Requests for Information to Licking Valley Rural Electric Cooperative Corporation [hereinafter referred to as "LVRECC"] 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) Please repeat the question to which each response is intended to refer. The Office of the Attorney General can provide counsel for LVRECC with an electronic version of these questions, upon request.

(4) 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.

(5) Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association, 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 the Office of Attorney General.

(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) If the company has objections 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.

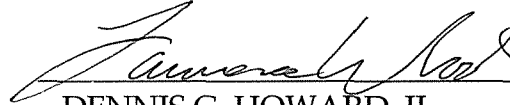
(10) For any document withheld on the basis of privilege, state the following: date; author; addressee; indicated or blind copies; all persons to

whom distributed, shown, or explained; and, the nature and legal basis for the privilege asserted.

(11) 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.

(12) 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,
JACK CONWAY
ATTORNEY GENERAL



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Certificate of Service and Filing

Counsel certifies that an original and ten photocopies of the foregoing were served and filed by hand delivery to Jeff Derouen, 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:

Hon. Gregory D. Allen
Attorney at Law
Collins & Allen Attorneys at Law
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Salyersville, KY 41465

Kerry K. Howard
Manager, Finance and Administration
Licking Valley R.E.C.C.
P. O. Box 605
West Liberty, KY 41472

this 1 day of September, 2009


Assistant Attorney General

LICKING VALLEY RURAL ELECTRIC COOPERATIVE
CASE NO. 2009-00016
Attorney General's Supplemental Data Requests to Licking Valley RECC

1. With regard to the response to AG-1-8, please provide the test year expense amount associated with the "Freedom" ads.
2. With regard to Exhibit 13, page 1, please provide the following information:
 - a. Reconcile the total 2008 CATV rental revenues of \$16,091 shown on Exhibit 13 to the total 2008 CATV rental revenues of \$22,215 shown on Exhibit X, page 1.
 - b. Compare the 2008 number of pole attachments shown on Exhibit 13 (1,810; 1,286, 1,009 and 4) to the corresponding number of pole attachments for 2006 and 2007 shown in the response to AG-1-4 and explain the significant decreases in the 2008 pole attachments shown on Exhibit 13 from the number of corresponding pole attachments in 2006 and 2007.
3. With regard to the response to AG-1-7, please provide the following information:
 - a. Explain why it is reasonable to charge the following expense items to the ratepayers:
 - Food for Girl Scouts (\$40.07)
 - Donate Caps to Girl Scouts (\$15.00)
 - Washington Youth Tour (\$3,600.00)
 - Donation (\$200)
 - History of Ky Cooperative books (\$1,865.60)
 - b. Purpose of the \$10 charge for the Magoffin Co Comm Day – CFL bulb demonstration and explanation as to why this should be charged to the ratepayers.
 - c. Purpose of the "CFL light bulb for demonstration" expenses of \$78.43 and \$3,337.73 and explanation as to why these expenses should be charged to the ratepayers.
 - d. Description of purpose of KAEC "Energy Alert" handout; explain at what event(s) these expenses were incurred; and provide a copy of the handout.
4. In the same format and detail as per Exhibit 12, please provide the actual rate case expenses incurred and booked through September 7, 2009.
5. The response to AG-1-15 shows that the test year Account 92100 – Office Supplies & Expenses include a total of \$951.28 for "Coffee for Employees." Please confirm this and explain why it is appropriate to charge the ratepayers with this expense.

LICKING VALLEY RURAL ELECTRIC COOPERATIVE

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6. The response to AG-1-15 shows that the test year Account 92100 – Office Supplies & Expenses include a total of \$2,442.95 for Board Meeting meals. Please explain why it is appropriate to charge the ratepayers with this expense.
7. Please provide a description of the nature and purpose of the following KAEC annual meeting expenses included in the test year Account 92100 – Office Supplies & Expenses (per the response to AG-1-15) In addition, explain why it is appropriate to charge the ratepayers with these expenses:
 - a. \$425.96 for KAEC monthly meeting, gas, meals.
 - b. \$37.00 for “Meal for KAEC/PSC Reg Rev mtg.”
 - c. \$485.15 for KAEC Red Flag meeting
 - d. \$810.00 for KAEC Annual Meeting meals.
 - e. \$1,643.68 for KAEC Annual Meeting.
8. Please provide a description of the nature and purpose of the following test year Account 92100 – Office Supplies & Expenses shown in the response to AG-1-15. In addition, explain why it is appropriate to charge the ratepayers with these expenses:
 - a. \$170.85 for Legislative Conference expenses
 - b. \$997.00 for Legislative Conference expenses
 - c. \$193.48 for Decorations for Sorghum Festival
 - d. \$106 for Flowers for Funeral
 - e. \$98.76 for Fall Flower Decorations
 - f. \$160.00 Subscription to Legal Reporting Service