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November 23, 2009

RECEIVED

NOV 25 2009

PUBLIC SERVICE COMMISSION

Mr. Jeff Derouen Executive Director Kentucky Public Service Commission 211 Sower Boulevard Frankfort, KY 40601

Re: Case No. 2009-00143

Dear Mr. Derouen:

Please find enclosed an original and seven copies of the responses to the Third Data Request of Commission Staff to Inter-County Energy Cooperative in Case No. 2009-00143 dated November 19, 2009.

Please advise if additional information is required.

Very truly yours,

James William Barnett

Counsel for Inter-County Energy Cooperative Corporation

COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF INTER-COUNTY ENERGY)	
COOPERATIVE FOR A CERTIFICATE OF)	
CONVENIENCE AND NECESSITY PURSUANT)	
TO KRS 278.020(1) AND 807 KAR 5:001,)	CASE NO.
SECTION 9, AND RELATED SECTIONS,)	2009-00143
AUTHORIZING CERTAIN PROPOSED)	
CONSTRUCTION IDENTIFIED AS THE)	
2009-2012 CONSTRUCTION WORK PLAN)	

RESPONSES TO

THIRD DATA REQUEST OF COMMISSION STAFF TO INTER-COUNTY ENERGY COOPERATIVE

1. In its response to question 1.b of the Commission Staff's second data request ("Staff's Second Request"), Inter-County states that:

Attached is a spreadsheet labeled "Exhibit C", which details the materials that would be involved in the installation of both the Aclara and Landis+Gyr systems. Also attached, labeled "Exhibit D", are copies of the information provided by the vendors. Due to a confidentiality agreement signed with Landis+Gyr/Hunt system and emails with confidentiality disclosures, some items or information has [sic] been omitted.

Provide the cost information which was omitted from Inter-County's response to Staff's second data request, question 1.b. If Inter-County or the vendors claim that such information is confidential pursuant to KRS 61.878, Inter-County or the vendors shall submit a petition for confidentiality to the Commission in accordance with the provisions of 807 KAR 5:001, Section 7. However, pursuant to subsection (5) of that regulation, no party to a Commission case can decline to respond for discovery on grounds of confidentiality.

Response:

See Attachment "A" which details in full the materials that would be involved with the installation of the Aclara and Landis+Gyr Systems. "Exhibit D" of our previous response is general information and no information was omitted from that compilation. This information was provided to Inter-County Energy by the vendors under confidentiality agreements. Inter-County Energy respectfully requests that you honor these confidentiality agreements.

2. Refer to the attached e-mail dated November 5, 2009 from Inter-County to HD Supply which states, in part: "[t]his work plan was submitted at the first of '09 and construction work has already begun." Explain in detail which projects in Inter- County's 2009-2012 construction work plan are already under construction, when construction started on each project, and the percentage of project cost already committed for each project.

Response:

See Attachment "B", which answers the above questions. This attachment does explain the project in detail. However, if additional information is required, please refer to the previously submitted Inter-County Energy 2009-2012 Construction Work Plan Section 3-C in which the construction items are listed in order of CFR CODE.

Marvin Graham, being duly sworn, states that he has prepared the responses to the Third Data Request of Commission Staff to Inter-County Energy Cooperative in Case No. 2009-00143, dated November 19, 2009, and that the matters and things set forth therein are true and accurate to the best of my knowledge, information and belief, formed after reasonable inquiry.

Marvin Graham, Vice President-Operations
Inter-County Energy Cooperative Corporation

Subscribed and sworn to before me by Marvin Graham as Vice President-Operations of Inter-County Energy Cooperative Corporation this 23rd day of November, 2009.

NOTARY PUBLIC STATE OF KENTUCKY COUNTY OF BOYLE

My Commission Expires _

7/15/2013

James William Barnett

Counsel for Inter-County Energy Cooperative Corporation

114 South Fourth Street - Danville, KY 40422

Telephone: (859) 236-2641 / Fax: (859) 236-1483

EXHIBIT B

INTER COUNTY ENERGY 2009-2012 CONSTRUCTION WORK PLAN

ANSWERS TO PSC QUESTION 11/20/2009

WORK PLAN CFR CODE	DESCRIPTION OF PROPOSED CONSTRUCTION	CONSTRUCTION START DATE	% OF COST COMMITTED
305	Convert 3.42 miles of 1 phase distribution circuit to 3 phase $1/0$ AAAC. Install $2-333$ KVA step transformers at line section 22207. Install $2-50E$ reclosers at R85. Loretto Road	Aug-09	100%
306	Convert 14.4 miles of 3 phase distribution (98 transformers) from 12.47 KV to 25 KV. Install 1-333 KVA step transformer at line section 15156. Remove 3 – 70L reclosers at line section 20972, R223-224-225. Remove 3 – 333 KVA step transformers at line section 22207. Remove 3 – 333 KVA step transformers at line section 15051. Remove 3 – 50H reclosers at line section 22207. Loretto Road	Jun-09	100%
307	Reconductor 2.3 miles of 3 phase distribution circuit with 1/0 AAAC.	Sep-09	100%
313	Replace 2.65 mile of 1 phase #4 ACSR with 1 phase 1/0 AAAC.	Nov-09	5%
314	Convert 10.42 mile of 1 phase distribution (74 transformers) from 7.2 KV to 14.4 KV. Remove 1 – 333 KVA step transformer at line section 15534. Remove 1 -144 KVA/100Amp voltage regulator at line section 15535. Replace R84, 1 – 50H recloser with 1 -50E recloser. Replace poles and equipment as required.	Aug-09	100%
319	Reconductor 1.92 mile of 3 phase 1/0 AAAC with 3 phase 397 ACSR. Remove 3-70L reclosers at R24-33-136.	Oct-09	40%
330	Convert 5.2 miles of single phase distribution (36 transformers) from 7.2KV to 14.4KV. Remove 1-333KVA step transformer. Replace R403, 1-50H with 1-50E recloser. Replace poles and equipment as required.	Jul-09	100%
332	Re-conductor 2.9 miles of deteriorated conductor with 1/0 AAAC.	Apr-09	100%
333	Re-conductor 2.9 miles of deteriorated conductor with 1/0 AAAC.	Jun-09	100%
339	Re-conductor 2 miles of deteriorated primary conductor with 1/0 AAAC.	Sep-09	90%
365	Re-conductor 1.6 miles of deteriorated primary conductor with 1/0 AAAC.	May-09	100%
370	Re-conductor 4.4 miles of deteriorated conductor with 1/0 AAAC.	Jan-09	100%