

DEFINITIONS AND INSTRUCTIONS

1. The term "document", as used herein, shall be used in its broadest sense and shall mean and include all handwritten, printed, typed, recorded, electronic, computer-generated and/or graphic matter of every kind and description and includes all copies, drafts, proofs, both originals and copies, either (1) in your possession, custody or control, regardless of where located, or (2) produced or generated by, known or seen by you, but not now in your possession, custody or control, regardless of where located and whether they are still in existence.

(a) Such "documents" shall include, but are not limited to contracts, leases, agreements, papers, photographs, transcripts, checks, checkbooks, check stubs, check statements, bank statements, deposit slips, journals, general and subsidiary ledgers, other types of ledgers, work sheets, accounts, bills, promissory notes, invoices, purchase orders, acknowledgements, authorizations, sales slips, receipts, shipping papers, letters or other forms of correspondence, envelopes or folders or similar containers, communications, programs, telex, and other teletype communications, computer printouts and any other printout sheets, memoranda, reports, studies, summaries, minutes, minute books, circulars, notes (whether typewritten, handwritten or otherwise), agenda, instructions, manuals, brochures, schedules, price lists, telegrams, telecopies, faxes, other drawings, sketches, plans, formal records, calendars, notebooks, diaries, registers, appointment books, budgets, analyses, minutes of meetings, conferences or discussions of any kind, tax returns, and other data compilations from

which information can be obtained (including matter used in data processing) or translated, and other printed, written, handwritten, recorded stenographers, computer-generated, computer-stored, or electronically sorted matter, however and by whomever produced, prepared, and reproduced, disseminated or made.

(b) For purposes of production of "documents", that term shall include copies of all documents being produced to the extent the copies are not identical to the original, thus, requiring the production of copies that contain any markings, additions, or deletions that make them different in any way from the documents being produced, that being the original.

2. The term "communication", as used herein, shall mean and include any transmission or exchange of information between two or more persons, whether orally or in writing, and including without limitation any conversation or discussion by means of letters, telephone, note, memorandum, telegraph, telex, telecopier, cable, or any other electronic or other medium.

3. The term "person", as used herein, includes individuals, firms, corporations, partnerships, joint ventures, associations, governmental entities, other entities, or group of persons, and each division, department and other unit thereof, unless the context clearly indicates reference only to a specific individual.

4. The terms "and" and "or", as used herein, shall be construed either conjunctively or disjunctively as required for the context to bring with the scope of these requests any information which might be deemed outside their scope by any other construction.

5. The word "date", as used herein, shall mean the exact day, month and year, if ascertainable, or if not ascertainable, the best approximation.

6. The term "identify" means:

(a) With respect to a document, state the author(s), the recipient(s), the person(s) to whom copies were furnished, the date, subject, and type of document, and its present or last known location.

(b) With respect to a fact, state the fact and the basis on which you rely for asserting the truth or existence of such fact.

(c) With respect to a person who is an individual, state his or her full name, present or last known business and home address, employer, and position or title.

(d) With respect to a person who is not an individual, state the full name and present or last known address; and

(e) With respect to a communication, state date, location, purpose, and subjects discussed, and identify (as defined herein) all persons who participated in the communication.

7. If your response to any Interrogatory is other than an unqualified response, state for such Interrogatory the following:

(a) All facts you contend support in any manner your refusal to respond, or your qualified admission;

(b) the identity of all documents that support in any manner your refusal to respond, or qualification of your response or admission; and

(c) The name and address of all persons, including consultants, purported to have any knowledge or factual data upon which you base your refusal to respond to your qualification of response or admission.

8. If any document is withheld under a claim of privilege, furnish a list that identifies each document for which the privilege is claimed, including the following information:

(a) The date of the document;

(b) The sender(s);

(c) The recipient(s);

(d) Each person who has or has had access to or received a copy of the document or any portion thereof;

(e) The subject matter and length of the document;

(f) The basis on which the privilege is claimed and the facts supporting such claim; and

(g) The paragraph of the Request for production of documents to which the document is responsive.

9. If any responsive document once was, but is no longer, in your possession, custody or control, identify which disposition was made of the document, its present location, and its present custodian.

10. If the document has been destroyed, identify that document by date, author(s), address(es) and subject matter; date of destruction; manner of the destruction; reason for such destruction; person authorizing such destruction; and custodian of the document at the time of its destruction.

11. When reference is made to a corporation, association, union, partnership, or other entity, such reference shall refer to that corporation, association, partnership or other entity in addition to (when applicable), its parties, subsidiaries, predecessors, affiliates, successors, assigns, officers, directors, agents, employees, representatives, attorneys, and other persons acting or purporting to act, or having acted or purportedly to act, directly or indirectly, on its behalf.

REQUESTS TO PRODUCE

REQUEST NO. 1: Provide to Plaintiffs any and all documents evidencing the manner and/or method for determining and/or calculating demand rates for any grain drying operations or grain bin operations.

REQUEST NO. 2: Any and all documents evidencing the definitions of the respective formulas and/or the manner of calculating the demand

rates, in particular relating to the specific accounts concerning the Plaintiffs.

REQUEST NO. 3: Any and all documents utilized in developing the formula or otherwise in calculating the utility charges and inclusive of all services provided to the Plaintiffs since the opening of the accounts at issue.

REQUEST NO. 4: Any and all documents utilized by Defendant representing authority, whether statutory or regulatory, enabling Defendant to use the manner and method in which Defendant currently calculates the electrical rates/demand rates for charges on Plaintiffs' respective accounts.

WOMACK LAW OFFICE, LLC

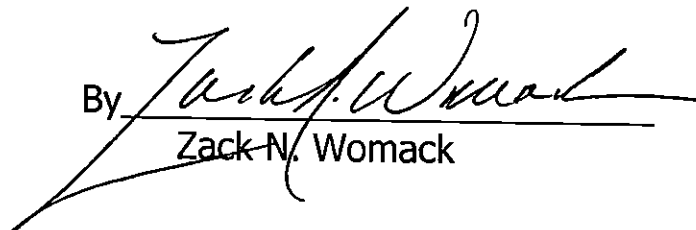
304 First Street

P. O. Box 637

Henderson, Kentucky 42419-0637

270/826-5040

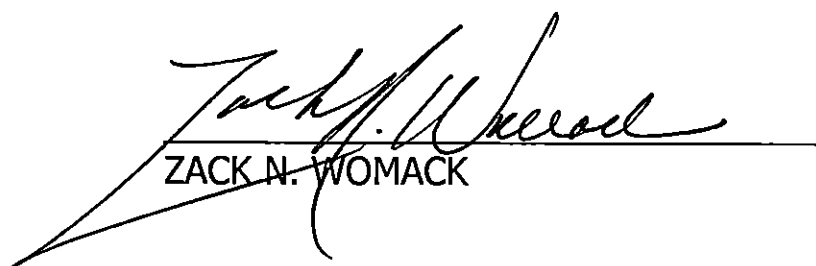
By

A handwritten signature in black ink, appearing to read "Zack N. Womack", written over a horizontal line.

Zack N. Womack

CERTIFICATE OF SERVICE

It is hereby certified that a true copy of the foregoing has been served upon Honorable Allyson K. Sturgeon, Senior Corporate Attorney, LG&E and KU Energy LLC, 220 West Main Street, Louisville, Kentucky 40202; and Honorable Sara Veeneman, Corporate Attorney, LG&E and KU Energy LLC, 220 West Main Street, Louisville, Kentucky 40202, attorneys for Defendant, on this the 6th day of January, 2016.


ZACK N. WOMACK