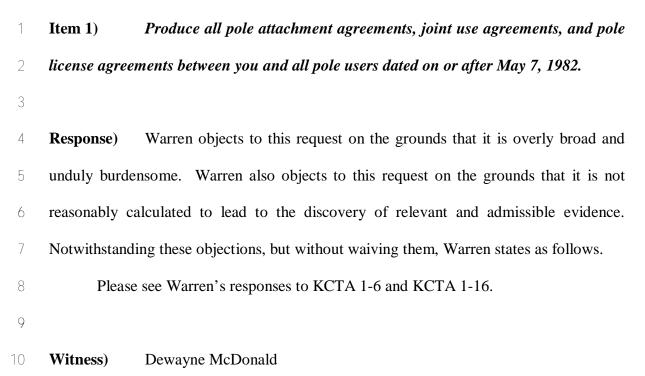
IN THE MATTER OF: PETITION OF THE KENTUCKY CABLE TELECOMMUNICATIONS ASSOCIATION FOR A DECLARATORY ORDER THAT THE COMMISSION HAS JURISDICTION TO REGULATE THE POLE ATTACHMENT RATES, TERMS AND CONDITIONS OF COOPERATIVES THAT PURCHASE ELECTRICITY FROM THE TENNESSEE VALLEY AUTHORITY CASE NO. 2012-00544

Response to KCTA's Supplemental Requests for Information dated December 2, 2013

December 23, 2013

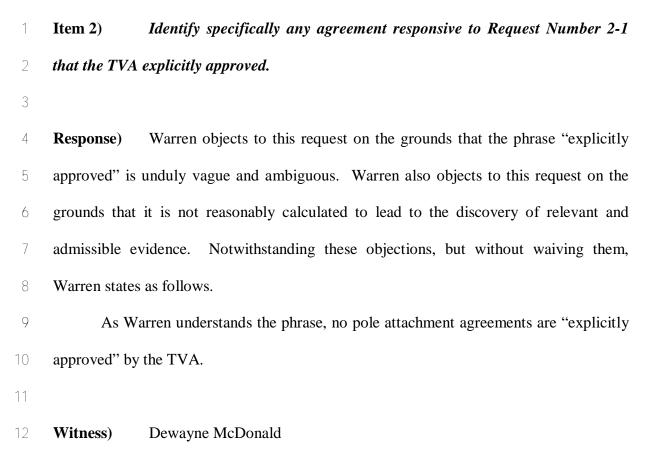


Case No. 2012-00544
Warren Rural Electric Cooperative Corporation
Response to KCTA 2-1
Witness: Dewayne McDonald
Page 1 of 1

IN THE MATTER OF: PETITION OF THE KENTUCKY CABLE TELECOMMUNICATIONS ASSOCIATION FOR A DECLARATORY ORDER THAT THE COMMISSION HAS JURISDICTION TO REGULATE THE POLE ATTACHMENT RATES, TERMS AND CONDITIONS OF COOPERATIVES THAT PURCHASE ELECTRICITY FROM THE TENNESSEE VALLEY AUTHORITY CASE NO. 2012-00544

Response to KCTA's Supplemental Requests for Information dated December 2, 2013

December 23, 2013



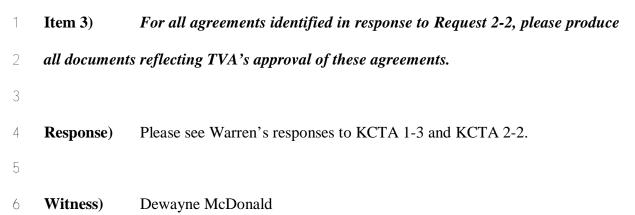
Case No. 2012-00544
Warren Rural Electric Cooperative Corporation
Response to KCTA 2-2
Witness: Dewayne McDonald
Page 1 of 1

IN THE MATTER OF: PETITION OF THE KENTUCKY CABLE TELECOMMUNICATIONS ASSOCIATION FOR A DECLARATORY ORDER THAT THE COMMISSION HAS JURISDICTION TO REGULATE THE POLE ATTACHMENT RATES, TERMS AND CONDITIONS OF COOPERATIVES THAT PURCHASE ELECTRICITY FROM THE TENNESSEE VALLEY AUTHORITY

Response to KCTA's Supplemental Requests for Information dated December 2, 2013

CASE NO. 2012-00544

December 23, 2013



Case No. 2012-00544
Warren Rural Electric Cooperative Corporation
Response to KCTA 2-3
Witness: Dewayne McDonald
Page 1 of 1

IN THE MATTER OF: PETITION OF THE KENTUCKY CABLE TELECOMMUNICATIONS ASSOCIATION FOR A DECLARATORY ORDER THAT THE COMMISSION HAS JURISDICTION TO REGULATE THE POLE ATTACHMENT RATES, TERMS AND CONDITIONS OF COOPERATIVES THAT PURCHASE ELECTRICITY FROM THE TENNESSEE VALLEY AUTHORITY CASE NO. 2012-00544

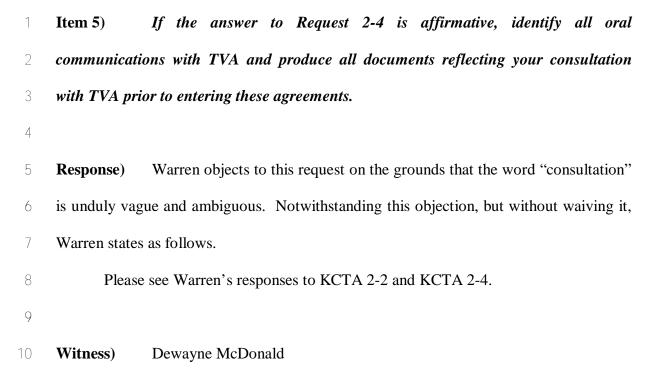
Response to KCTA's Supplemental Requests for Information dated December 2, 2013

1	Item 4)	Did you consult with TVA prior to entering any agreement identified in
2	response to R	equest 2-1?
3		
4	Response)	Warren objects to this request on the grounds that the word "consult" is
5	unduly vague	and ambiguous. Notwithstanding this objection, but without waiving it,
6	Warren states	as follows.
7	Please	see Warren's response to KCTA 2-2.
8		
9	Witness)	Dewayne McDonald

IN THE MATTER OF: PETITION OF THE KENTUCKY CABLE TELECOMMUNICATIONS ASSOCIATION FOR A DECLARATORY ORDER THAT THE COMMISSION HAS JURISDICTION TO REGULATE THE POLE ATTACHMENT RATES, TERMS AND CONDITIONS OF COOPERATIVES THAT PURCHASE ELECTRICITY FROM THE TENNESSEE VALLEY AUTHORITY CASE NO. 2012-00544

Response to KCTA's Supplemental Requests for Information dated December 2, 2013

December 23, 2013



Case No. 2012-00544
Warren Rural Electric Cooperative Corporation
Response to KCTA 2-5
Witness: Dewayne McDonald
Page 1 of 1

IN THE MATTER OF: PETITION OF THE KENTUCKY CABLE TELECOMMUNICATIONS ASSOCIATION FOR A DECLARATORY ORDER THAT THE COMMISSION HAS JURISDICTION TO REGULATE THE POLE ATTACHMENT RATES, TERMS AND CONDITIONS OF COOPERATIVES THAT PURCHASE ELECTRICITY FROM THE TENNESSEE VALLEY AUTHORITY CASE NO. 2012-00544

Response to KCTA's Supplemental Requests for Information dated December 2, 2013

December 23, 2013

1	Item 6)	Did TVA explicitly approve your March 8, 2010 Joint Use Agreement
2	with BellSouth	Telecommunications, Inc.?
3		
4	Response)	Warren objects to this request on the grounds that the phrase "explicitly
5	approve" is ur	nduly vague and ambiguous. Warren also objects to this request on the
6	grounds that i	t is not reasonably calculated to lead to the discovery of relevant and
7	admissible evi	idence. Notwithstanding these objections, but without waiving them
8	Warren states a	as follows.
9	Please	see Warren's response to KCTA 2-2.
10		
11	Witness)	Dewayne McDonald

Case No. 2012-00544
Warren Rural Electric Cooperative Corporation
Response to KCTA 2-6
Witness: Dewayne McDonald
Page 1 of 1

IN THE MATTER OF: PETITION OF THE KENTUCKY CABLE TELECOMMUNICATIONS ASSOCIATION FOR A DECLARATORY ORDER THAT THE COMMISSION HAS JURISDICTION TO REGULATE THE POLE ATTACHMENT RATES, TERMS AND CONDITIONS OF COOPERATIVES THAT PURCHASE ELECTRICITY FROM THE TENNESSEE VALLEY AUTHORITY CASE NO. 2012-00544

Response to KCTA's Second Requests for Information dated December 2, 2013

December 23, 2013

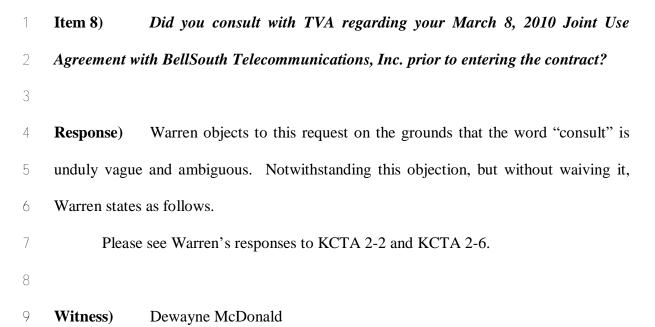
1	Item 7)	If the answer to Request 2-6 is affirmative, please produce all documents
2	reflecting TVA's approval of the March 8, 2010 Joint Use Agreement with BellSou	
3	Telecommun	nications, Inc.
4		
5	Response)	Please see Warren's responses to KCTA 2-2 and KCTA 2-6.
6		
7	Witness)	Dewayne McDonald

Case No. 2012-00544
Warren Rural Electric Cooperative Corporation
Response to KCTA 2-7
Witness: Dewayne McDonald
Page 1 of 1

IN THE MATTER OF: PETITION OF THE KENTUCKY CABLE TELECOMMUNICATIONS ASSOCIATION FOR A DECLARATORY ORDER THAT THE COMMISSION HAS JURISDICTION TO REGULATE THE POLE ATTACHMENT RATES, TERMS AND CONDITIONS OF COOPERATIVES THAT PURCHASE ELECTRICITY FROM THE TENNESSEE VALLEY AUTHORITY CASE NO. 2012-00544

Response to KCTA's Second Requests for Information dated December 2, 2013

December 23, 2013



Case No. 2012-00544
Warren Rural Electric Cooperative Corporation
Response to KCTA 2-8
Witness: Dewayne McDonald
Page 1 of 1

IN THE MATTER OF: PETITION OF THE KENTUCKY CABLE TELECOMMUNICATIONS ASSOCIATION FOR A DECLARATORY ORDER THAT THE COMMISSION HAS JURISDICTION TO REGULATE THE POLE ATTACHMENT RATES, TERMS AND CONDITIONS OF COOPERATIVES THAT PURCHASE ELECTRICITY FROM THE TENNESSEE VALLEY AUTHORITY CASE NO. 2012-00544

Response to KCTA's Second Requests for Information dated December 2, 2013

December 23, 2013

I	item 9) If the answer to Request 2-8 is affirmative, please identify all
2	communications and produce all documents reflecting your consultation with TVA
3	before you entered the March 8 2010 Joint Use Agreement with BellSouth
4	Telecommunications, Inc.
5	
6	Response) Warren objects to this request on the grounds that the word "consultation"
7	is unduly vague and ambiguous. Notwithstanding this objection, but without waiving it,
8	Warren states as follows.
9	Please see Warren's responses to KCTA 2-2, KCTA 2-6 and KCTA 2-8.
10	
11	Witness) Dewayne McDonald

Case No. 2012-00544
Warren Rural Electric Cooperative Corporation
Response to KCTA 2-9
Witness: Dewayne McDonald
Page 1 of 1

IN THE MATTER OF: PETITION OF THE KENTUCKY CABLE TELECOMMUNICATIONS ASSOCIATION FOR A DECLARATORY ORDER THAT THE COMMISSION HAS JURISDICTION TO REGULATE THE POLE ATTACHMENT RATES, TERMS AND CONDITIONS OF COOPERATIVES THAT PURCHASE ELECTRICITY FROM THE TENNESSEE VALLEY **AUTHORITY** CASE NO. 2012-00544

Response to KCTA's Supplemental Requests for Information dated December 2, 2013

December 23, 2013

Item 10) For each of the last five years, provide your "surplus revenues" as 1 2 defined in Paragraph 6(b) of the TVA Contract. 3 4 Response) Warren objects to this request on the grounds that it is overly broad and 5 unduly burdensome. Warren also objects to this request on the grounds that the requested 6 data are not readily available. Warren also objects to this request on the grounds that it is 7 not reasonably calculated to lead to the discovery of relevant and admissible evidence. 8 9 Witness) Counsel

Case No. 2012-00544 Warren Rural Electric Cooperative Corporation Response to KCTA 2-10 **Witness: Counsel**

Page 1 of 1

IN THE MATTER OF: PETITION OF THE KENTUCKY CABLE TELECOMMUNICATIONS ASSOCIATION FOR A DECLARATORY ORDER THAT THE COMMISSION HAS JURISDICTION TO REGULATE THE POLE ATTACHMENT RATES, TERMS AND CONDITIONS OF COOPERATIVES THAT PURCHASE ELECTRICITY FROM THE TENNESSEE VALLEY AUTHORITY CASE NO. 2012-00544

Response to KCTA's Supplemental Requests for Information dated December 2, 2013

December 23, 2013

1	Item 11) For each of the last three fiscal years, produce the annual financial
2	reports you provided to TVA pursuant to Paragraph 1(c) of the "Schedule of Terms
3	and Conditions" of the TVA Contract.
4	
5	Response) Warren objects to this request on the grounds that it is not reasonably
6	calculated to lead to the discovery of relevant and admissible evidence. Notwithstanding
7	this objection, but without waiving it, Warren states as follows.
8	Please see the attached documents.
9	
10	Witness) Dewayne McDonald

Case No. 2012-00544
Warren Rural Electric Cooperative Corporation
Response to KCTA 2-11
Witness: Dewayne McDonald
Page 1 of 1

IN THE MATTER OF: PETITION OF THE KENTUCKY CABLE TELECOMMUNICATIONS ASSOCIATION FOR A DECLARATORY ORDER THAT THE COMMISSION HAS JURISDICTION TO REGULATE THE POLE ATTACHMENT RATES, TERMS AND CONDITIONS OF COOPERATIVES THAT PURCHASE ELECTRICITY FROM THE TENNESSEE VALLEY AUTHORITY CASE NO. 2012-00544

Response to KCTA's Supplemental Requests for Information dated December 2, 2013

December 23, 2013

1	Item 12) Do you report the revenues you generate from pole attachments to the
2	TVA, separate and distinct from the other revenue you generate?
3	
4	Response) As prescribed by Form TVA 3957, Warren reports pole attachment
5	revenues as "rent from electric property" along with other rents. Please see Warren's
5	response to KCTA 2-11.
7	
3	Witness) Dewayne McDonald

Case No. 2012-00544
Warren Rural Electric Cooperative Corporation
Response to KCTA 2-12
Witness: Dewayne McDonald

Page 1 of 1

IN THE MATTER OF: PETITION OF THE KENTUCKY CABLE TELECOMMUNICATIONS ASSOCIATION FOR A DECLARATORY ORDER THAT THE COMMISSION HAS JURISDICTION TO REGULATE THE POLE ATTACHMENT RATES, TERMS AND CONDITIONS OF COOPERATIVES THAT PURCHASE ELECTRICITY FROM THE TENNESSEE VALLEY AUTHORITY CASE NO. 2012-00544

Response to KCTA's Supplemental Requests for Information dated December 2, 2013

December 23, 2013

1	Item 13)	If the answer to Request 2-12 is affirmative, please produce all
2	documents r	eflecting your pole attachment revenue reports to TVA for each of the past
3	five years.	
4		
5	Response)	Please see Warren's responses to KCTA 2-11 and KCTA 2-12.
5		
7	Witness)	Dewayne McDonald

Case No. 2012-00544
Warren Rural Electric Cooperative Corporation
Response to KCTA 2-13
Witness: Dewayne McDonald
Page 1 of 1

IN THE MATTER OF: PETITION OF THE KENTUCKY CABLE TELECOMMUNICATIONS ASSOCIATION FOR A DECLARATORY ORDER THAT THE COMMISSION HAS JURISDICTION TO REGULATE THE POLE ATTACHMENT RATES, TERMS AND CONDITIONS OF COOPERATIVES THAT PURCHASE ELECTRICITY FROM THE TENNESSEE VALLEY AUTHORITY CASE NO. 2012-00544

Response to KCTA's Supplemental Requests for Information dated December 2, 2013

December 23, 2013

1	Item 14)	Do you report your pole attachment rates to TVA?
2		
3	Response)	No. Warren reports its rates and revenues only as required by the TVA.
4		
5	Witness)	Dewayne McDonald

Case No. 2012-00544
Warren Rural Electric Cooperative Corporation
Response to KCTA 2-14
Witness: Dewayne McDonald
Page 1 of 1

IN THE MATTER OF: PETITION OF THE KENTUCKY CABLE TELECOMMUNICATIONS ASSOCIATION FOR A DECLARATORY ORDER THAT THE COMMISSION HAS JURISDICTION TO REGULATE THE POLE ATTACHMENT RATES, TERMS AND CONDITIONS OF COOPERATIVES THAT PURCHASE ELECTRICITY FROM THE TENNESSEE VALLEY AUTHORITY CASE NO. 2012-00544

Response to KCTA's Supplemental Requests for Information dated December 2, 2013

December 23, 2013

1	Item 15)	If the answer to Request 2-14 is affirmative, please produce all
2	documents r	reflecting your reports to TVA regarding your pole attachment rates for
3	each of the p	past five years.
4		
5	Response)	Please see Warren's response to KCTA 2-14.
6		
7	Witness)	Dewayne McDonald

Case No. 2012-00544
Warren Rural Electric Cooperative Corporation
Response to KCTA 2-15
Witness: Dewayne McDonald
Page 1 of 1

IN THE MATTER OF: PETITION OF THE KENTUCKY CABLE TELECOMMUNICATIONS ASSOCIATION FOR A DECLARATORY ORDER THAT THE COMMISSION HAS JURISDICTION TO REGULATE THE POLE ATTACHMENT RATES, TERMS AND CONDITIONS OF COOPERATIVES THAT PURCHASE ELECTRICITY FROM THE TENNESSEE VALLEY AUTHORITY CASE NO. 2012-00544

Response to KCTA's Supplemental Requests for Information dated December 2, 2013

December 23, 2013

Item 16) Do you report your pole-related costs to TVA?

Response) Pole-related costs are captured as part of Warren's reporting of operations, maintenance, and depreciation expenses in its annual reports. Please see Warren's response to KCTA 2-11.

Witness) Dewayne McDonald

Case No. 2012-00544
Warren Rural Electric Cooperative Corporation
Response to KCTA 2-16
Witness: Dewayne McDonald
Page 1 of 1

IN THE MATTER OF: PETITION OF THE KENTUCKY CABLE TELECOMMUNICATIONS ASSOCIATION FOR A DECLARATORY ORDER THAT THE COMMISSION HAS JURISDICTION TO REGULATE THE POLE ATTACHMENT RATES, TERMS AND CONDITIONS OF COOPERATIVES THAT PURCHASE ELECTRICITY FROM THE TENNESSEE VALLEY **AUTHORITY** CASE NO. 2012-00544

Response to KCTA's Second Requests for Information dated December 2, 2013

December 23, 2013

1	Item 17) If the answer to Request 2-16 is affirmative, please produce all
2	documents reflecting your reports to TVA regarding your pole-related costs for each of
3	the past five years.
4	
5	Response) Warren objects to this request on the grounds that it is overly broad and
6	unduly burdensome. Notwithstanding this objection, but without waiving it, Warren
7	states as follows.
8	Please see Warren's responses to KCTA 2-11 and KCTA 2-16.
9	
0	Witness) Dewayne McDonald

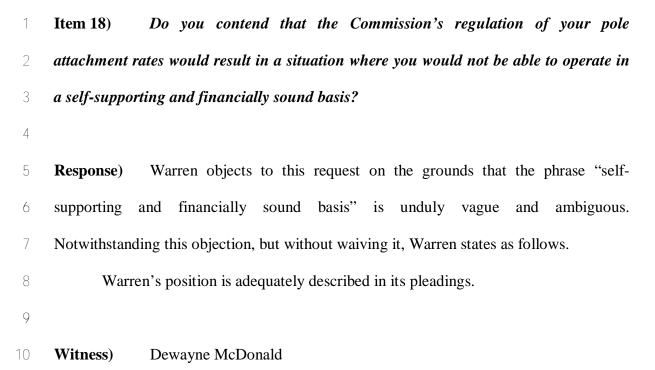
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Case No. 2012-00544 **Warren Rural Electric Cooperative Corporation Response to KCTA 2-17** Witness: Dewayne McDonald Page 1 of 1

IN THE MATTER OF: PETITION OF THE KENTUCKY CABLE TELECOMMUNICATIONS ASSOCIATION FOR A DECLARATORY ORDER THAT THE COMMISSION HAS JURISDICTION TO REGULATE THE POLE ATTACHMENT RATES, TERMS AND CONDITIONS OF COOPERATIVES THAT PURCHASE ELECTRICITY FROM THE TENNESSEE VALLEY AUTHORITY CASE NO. 2012-00544

Response to KCTA's Supplemental Requests for Information dated December 2, 2013

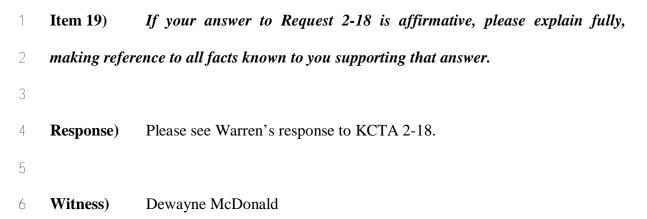
December 23, 2013



Case No. 2012-00544
Warren Rural Electric Cooperative Corporation
Response to KCTA 2-18
Witness: Dewayne McDonald
Page 1 of 1

IN THE MATTER OF: PETITION OF THE KENTUCKY CABLE TELECOMMUNICATIONS ASSOCIATION FOR A DECLARATORY ORDER THAT THE COMMISSION HAS JURISDICTION TO REGULATE THE POLE ATTACHMENT RATES, TERMS AND CONDITIONS OF COOPERATIVES THAT PURCHASE ELECTRICITY FROM THE TENNESSEE VALLEY AUTHORITY CASE NO. 2012-00544

Response to KCTA's Supplemental Requests for Information dated December 2, 2013



IN THE MATTER OF: PETITION OF THE KENTUCKY CABLE TELECOMMUNICATIONS ASSOCIATION FOR A DECLARATORY ORDER THAT THE COMMISSION HAS JURISDICTION TO REGULATE THE POLE ATTACHMENT RATES, TERMS AND CONDITIONS OF COOPERATIVES THAT PURCHASE ELECTRICITY FROM THE TENNESSEE VALLEY AUTHORITY CASE NO. 2012-00544

Response to KCTA's Supplemental Requests for Information dated December 2, 2013

December 23, 2013

1	Item 20)	Do you include revenues from pole attachments in the fund designated
2	for "electric	operations" as described in Paragraph 1(a) of the "Schedule of Terms and
3	Conditions"	of the TVA Contract?
4		
5	Response)	Warren includes revenues from pole attachments in a separate fund.
Ś		
7	Witness)	Dewayne McDonald

Case No. 2012-00544
Warren Rural Electric Cooperative Corporation
Response to KCTA 2-20
Witness: Dewayne McDonald
Page 1 of 1

IN THE MATTER OF: PETITION OF THE KENTUCKY CABLE TELECOMMUNICATIONS ASSOCIATION FOR A DECLARATORY ORDER THAT THE COMMISSION HAS JURISDICTION TO REGULATE THE POLE ATTACHMENT RATES, TERMS AND CONDITIONS OF COOPERATIVES THAT PURCHASE ELECTRICITY FROM THE TENNESSEE VALLEY AUTHORITY CASE NO. 2012-00544

Response to KCTA's Supplemental Requests for Information dated December 2, 2013

December 23, 2013

1	Item 21)	Do you use property "jointly for the electric system and other
2	operations"	as provided by Paragraph 1(a) of the "Schedule of Terms and Conditions"
3	of the TVA	Contract?
4		
5	Response)	Yes.
6		
7	Witness)	Dewayne McDonald

Case No. 2012-00544
Warren Rural Electric Cooperative Corporation
Response to KCTA 2-21
Witness: Dewayne McDonald
Page 1 of 1

IN THE MATTER OF: PETITION OF THE KENTUCKY CABLE TELECOMMUNICATIONS ASSOCIATION FOR A DECLARATORY ORDER THAT THE COMMISSION HAS JURISDICTION TO REGULATE THE POLE ATTACHMENT RATES, TERMS AND CONDITIONS OF COOPERATIVES THAT PURCHASE ELECTRICITY FROM THE TENNESSEE VALLEY AUTHORITY CASE NO. 2012-00544

Response to KCTA's Supplemental Requests for Information dated December 2, 2013

December 23, 2013

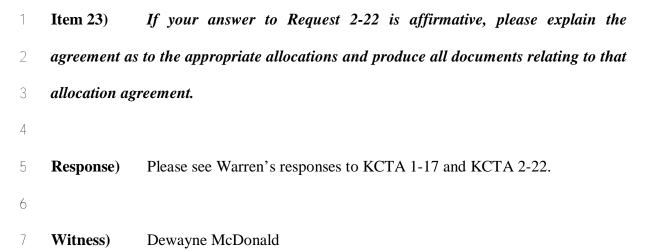
1	Item 22)	If your answer to Request 2-21 is affirmative, have you and TVA entered
2	into an agre	eement as to the appropriate allocations of joint investments, salaries and
3	other expenses, funds, or use of property or facilities?	
4		
5	Response)	Please see West Kentucky's response to KCTA 1-17.
6		
7	Witness)	Dewayne McDonald

Case No. 2012-00544
Warren Rural Electric Cooperative Corporation
Response to KCTA 2-22
Witness: Dewayne McDonald
Page 1 of 1

IN THE MATTER OF: PETITION OF THE KENTUCKY CABLE TELECOMMUNICATIONS ASSOCIATION FOR A DECLARATORY ORDER THAT THE COMMISSION HAS JURISDICTION TO REGULATE THE POLE ATTACHMENT RATES, TERMS AND CONDITIONS OF COOPERATIVES THAT PURCHASE ELECTRICITY FROM THE TENNESSEE VALLEY AUTHORITY CASE NO. 2012-00544

Response to KCTA's Supplemental Requests for Information dated December 2, 2013

December 23, 2013



Case No. 2012-00544
Warren Rural Electric Cooperative Corporation
Response to KCTA 2-23
Witness: Dewayne McDonald
Page 1 of 1

IN THE MATTER OF: PETITION OF THE KENTUCKY CABLE TELECOMMUNICATIONS ASSOCIATION FOR A DECLARATORY ORDER THAT THE COMMISSION HAS JURISDICTION TO REGULATE THE POLE ATTACHMENT RATES, TERMS AND CONDITIONS OF COOPERATIVES THAT PURCHASE ELECTRICITY FROM THE TENNESSEE VALLEY AUTHORITY CASE NO. 2012-00544

Response to KCTA's Supplemental Requests for Information dated December 2, 2013

1	Item 24)	Provide the information requested in KCTA's First Request for
2	Information 1	Number 20 for each of the years 2010, 2011, and 2012 according to the
3	FERC accoun	ting system outlined in 18 C.F.R. Chapter 1.
4		
5	Response)	Warren objects to this request on the grounds that it is duplicative of
6	KCTA 1-20.	Notwithstanding this objection, but without waiving it, Warren states as
7	follows.	
8	Please	see Warren's response to KCTA 1-20 and the TVA Cooperatives'
9	Response to K	CCTA's Motion to Compel filed November 27, 2013 in this matter.
10		
11	Witness)	Dewayne McDonald

IN THE MATTER OF: PETITION OF THE KENTUCKY CABLE TELECOMMUNICATIONS ASSOCIATION FOR A DECLARATORY ORDER THAT THE COMMISSION HAS JURISDICTION TO REGULATE THE POLE ATTACHMENT RATES, TERMS AND CONDITIONS OF COOPERATIVES THAT PURCHASE ELECTRICITY FROM THE TENNESSEE VALLEY AUTHORITY CASE NO. 2012-00544

Response to KCTA's Supplemental Requests for Information dated December 2, 2013

December 23, 2013

ļ	Item 25) Admit that you have produced all documents responsive to KCTA's First
2	Request for Information Number 6, which states, "Produce all documents concerning
3	how you ensure a pole attachment rate will provide sufficient revenues to cover the
4	costs of providing for the attachments."
5	
6	Response) Warren objects to this request on the grounds that the civil rules pertaining
7	to requests for admissions do not apply to data requests in Commission proceedings.
8	Notwithstanding this objection, but without waiving it, Warren states as follows.
9	Please see Warren's response to KCTA 1-6.
10	
11	Witness) Dewayne McDonald

Case No. 2012-00544
Warren Rural Electric Cooperative Corporation
Response to KCTA 2-25
Witness: Dewayne McDonald
Page 1 of 1

IN THE MATTER OF: PETITION OF THE KENTUCKY CABLE TELECOMMUNICATIONS ASSOCIATION FOR A DECLARATORY ORDER THAT THE COMMISSION HAS JURISDICTION TO REGULATE THE POLE ATTACHMENT RATES, TERMS AND CONDITIONS OF COOPERATIVES THAT PURCHASE ELECTRICITY FROM THE TENNESSEE VALLEY AUTHORITY CASE NO. 2012-00544

Response to KCTA's Supplemental Requests for Information dated December 2, 2013

1	Item 26)	If your answer to Request 2-25 is anything other than an unqualified
2	admission,	please produce all remaining documents responsive to KCTA's First
3	Request for I	Information Number 6.
4		
5	Response)	Please see Warren's responses to KCTA 1-6 and KCTA 2-25.
6		
7	Witness)	Dewayne McDonald

IN THE MATTER OF: PETITION OF THE KENTUCKY CABLE TELECOMMUNICATIONS ASSOCIATION FOR A DECLARATORY ORDER THAT THE COMMISSION HAS JURISDICTION TO REGULATE THE POLE ATTACHMENT RATES, TERMS AND CONDITIONS OF COOPERATIVES THAT PURCHASE ELECTRICITY FROM THE TENNESSEE VALLEY AUTHORITY CASE NO. 2012-00544

Response to KCTA's Supplemental Requests for Information dated December 2, 2013

December 23, 2013

ļ	Item 27) Admit that you have produced all documents responsive to KCTA's First
2	Request for Information Number 17, which states, "Produce all documents concerning
3	any order, directive, contract, or other communication from or by the TVA concerning
4	pole attachment rates."
5	
6	Response) Warren objects to this request on the grounds that the civil rules pertaining
7	to requests for admissions do not apply to data requests in Commission proceedings.
8	Notwithstanding this objection, but without waiving it, Warren states as follows.
9	Please see Warren's response to KCTA 1-17.
10	
11	Witness) Dewayne McDonald

Case No. 2012-00544
Warren Rural Electric Cooperative Corporation
Response to KCTA 2-27
Witness: Dewayne McDonald
Page 1 of 1

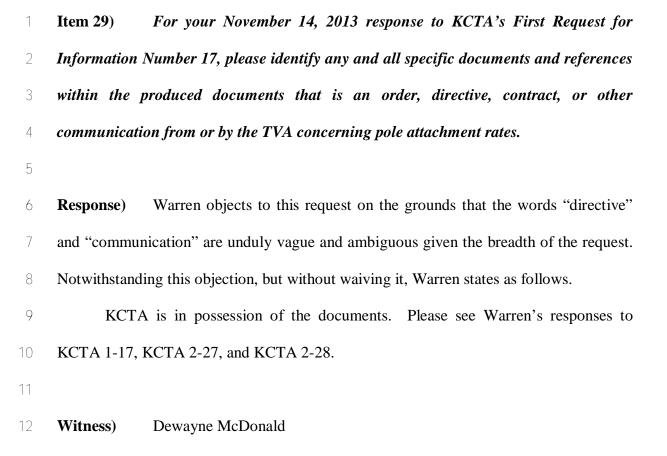
IN THE MATTER OF: PETITION OF THE KENTUCKY CABLE TELECOMMUNICATIONS ASSOCIATION FOR A DECLARATORY ORDER THAT THE COMMISSION HAS JURISDICTION TO REGULATE THE POLE ATTACHMENT RATES, TERMS AND CONDITIONS OF COOPERATIVES THAT PURCHASE ELECTRICITY FROM THE TENNESSEE VALLEY AUTHORITY CASE NO. 2012-00544

Response to KCTA's Supplemental Requests for Information dated December 2, 2013

1	Item 28)	If your answer to Request 2-27 is anything other than an unqualified
2	admission,	please produce all remaining documents responsive to KCTA's First
3	Request for I	Information Number 17.
4		
5	Response)	Please see Warren's responses to KCTA 1-17 and KCTA 2-27.
6		
7	Witness)	Dewayne McDonald

IN THE MATTER OF: PETITION OF THE KENTUCKY CABLE TELECOMMUNICATIONS ASSOCIATION FOR A DECLARATORY ORDER THAT THE COMMISSION HAS JURISDICTION TO REGULATE THE POLE ATTACHMENT RATES, TERMS AND CONDITIONS OF COOPERATIVES THAT PURCHASE ELECTRICITY FROM THE TENNESSEE VALLEY AUTHORITY CASE NO. 2012-00544

Response to KCTA's Second Requests for Information dated December 2, 2013



IN THE MATTER OF: PETITION OF THE KENTUCKY CABLE TELECOMMUNICATIONS ASSOCIATION FOR A DECLARATORY ORDER THAT THE COMMISSION HAS JURISDICTION TO REGULATE THE POLE ATTACHMENT RATES, TERMS AND CONDITIONS OF COOPERATIVES THAT PURCHASE ELECTRICITY FROM THE TENNESSEE VALLEY AUTHORITY CASE NO. 2012-00544

Response to KCTA's Second Requests for Information dated December 2, 2013

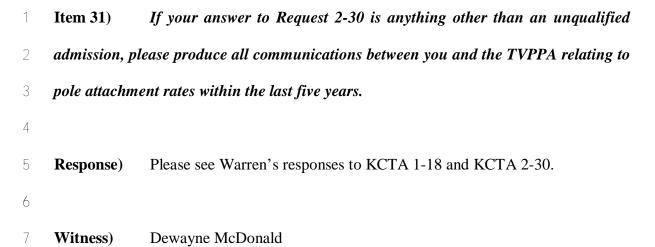
December 23, 2013

1	Item 30) Admit that you have produced all documents responsive to KCTA's First
2	Request for Information Number 18 that states, "Identify and produce all
3	communications with the TVPPA concerning pole attachment rates."
4	
5	Response) Warren objects to this request on the grounds that the civil rules pertaining
6	to requests for admissions do not apply to data requests in Commission proceedings.
7	Notwithstanding this objection, but without waiving it, Warren states as follows.
8	Please see Warren's response to KCTA 1-18.
9	
10	Witness) Dewayne McDonald

Case No. 2012-00544
Warren Rural Electric Cooperative Corporation
Response to KCTA 2-30
Witness: Dewayne McDonald
Page 1 of 1

IN THE MATTER OF: PETITION OF THE KENTUCKY CABLE TELECOMMUNICATIONS ASSOCIATION FOR A DECLARATORY ORDER THAT THE COMMISSION HAS JURISDICTION TO REGULATE THE POLE ATTACHMENT RATES, TERMS AND CONDITIONS OF COOPERATIVES THAT PURCHASE ELECTRICITY FROM THE TENNESSEE VALLEY AUTHORITY CASE NO. 2012-00544

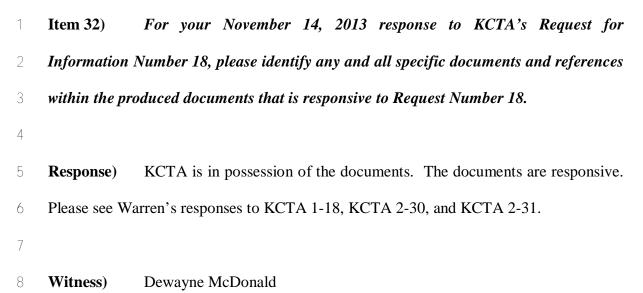
Response to KCTA's Supplemental Requests for Information dated December 2, 2013



IN THE MATTER OF: PETITION OF THE KENTUCKY CABLE TELECOMMUNICATIONS ASSOCIATION FOR A DECLARATORY ORDER THAT THE COMMISSION HAS JURISDICTION TO REGULATE THE POLE ATTACHMENT RATES, TERMS AND CONDITIONS OF COOPERATIVES THAT PURCHASE ELECTRICITY FROM THE TENNESSEE VALLEY AUTHORITY CASE NO. 2012-00544

Response to KCTA's Supplemental Requests for Information dated December 2, 2013

December 23, 2013



Case No. 2012-00544
Warren Rural Electric Cooperative Corporation
Response to KCTA 2-32
Witness: Dewayne McDonald
Page 1 of 1

IN THE MATTER OF: PETITION OF THE KENTUCKY CABLE TELECOMMUNICATIONS ASSOCIATION FOR A DECLARATORY ORDER THAT THE COMMISSION HAS JURISDICTION TO REGULATE THE POLE ATTACHMENT RATES, TERMS AND CONDITIONS OF COOPERATIVES THAT PURCHASE ELECTRICITY FROM THE TENNESSEE VALLEY AUTHORITY CASE NO. 2012-00544

Response to KCTA's Supplemental Requests for Information dated December 2, 2013

December 23, 2013

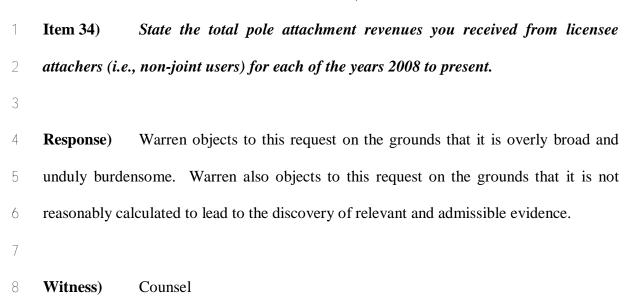
1	Item 33)	Produce all documents reflecting any communication between you and
2	the TVA con	cerning pole attachment revenues or rates from 2000 to present.
3		
4	Response)	Warren objects to this request on the grounds that it is overly broad and
5	unduly burd	ensome. Warren also objects to this request on the grounds that it is
6	duplicative o	of KCTA 1-16. Notwithstanding these objections, but without waiving them,
7	Warren state	s as follows.
8	Pleas	e see Warren's response to KCTA 1-16.
9		
10	Witness)	Dewayne McDonald

Case No. 2012-00544
Warren Rural Electric Cooperative Corporation
Response to KCTA 2-33
Witness: Dewayne McDonald
Page 1 of 1

IN THE MATTER OF: PETITION OF THE KENTUCKY CABLE TELECOMMUNICATIONS ASSOCIATION FOR A DECLARATORY ORDER THAT THE COMMISSION HAS JURISDICTION TO REGULATE THE POLE ATTACHMENT RATES, TERMS AND CONDITIONS OF COOPERATIVES THAT PURCHASE ELECTRICITY FROM THE TENNESSEE VALLEY AUTHORITY CASE NO. 2012-00544

Response to KCTA's Supplemental Requests for Information dated December 2, 2013

December 23, 2013



Case No. 2012-00544
Warren Rural Electric Cooperative Corporation
Response to KCTA 2-34
Witness: Counsel

Page 1 of 1

IN THE MATTER OF: PETITION OF THE KENTUCKY CABLE TELECOMMUNICATIONS ASSOCIATION FOR A DECLARATORY ORDER THAT THE COMMISSION HAS JURISDICTION TO REGULATE THE POLE ATTACHMENT RATES, TERMS AND CONDITIONS OF COOPERATIVES THAT PURCHASE ELECTRICITY FROM THE TENNESSEE VALLEY AUTHORITY CASE NO. 2012-00544

Response to KCTA's Supplemental Requests for Information dated December 2, 2013

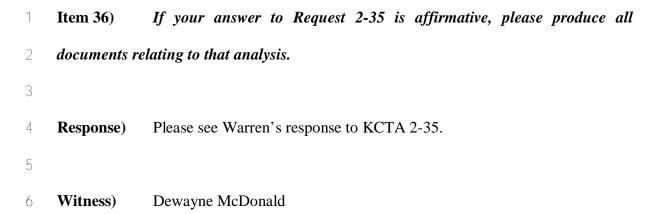
December 23, 2013

1	Item 35) Have you, or has anyone on your behalf, ever analyzed what your pole
2	attachment rates would be under the Commission's cost-based pole attachment rate
3	methodology as set forth in the September 17, 1982 order by the Commission in
4	Administrative Case No. 251?
5	
6	Response) Warren objects to this request on the grounds that it is not reasonably
7	calculated to lead to the discovery of relevant and admissible evidence. Notwithstanding
8	this objection, but without waiving it, Warren states as follows.
9	Warren is not aware of any such analysis.
10	
11	Witness) Dewayne McDonald

Case No. 2012-00544
Warren Rural Electric Cooperative Corporation
Response to KCTA 2-35
Witness: Dewayne McDonald
Page 1 of 1

IN THE MATTER OF: PETITION OF THE KENTUCKY CABLE TELECOMMUNICATIONS ASSOCIATION FOR A DECLARATORY ORDER THAT THE COMMISSION HAS JURISDICTION TO REGULATE THE POLE ATTACHMENT RATES, TERMS AND CONDITIONS OF COOPERATIVES THAT PURCHASE ELECTRICITY FROM THE TENNESSEE VALLEY AUTHORITY CASE NO. 2012-00544

Response to KCTA's Supplemental Requests for Information dated December 2, 2013



IN THE MATTER OF: PETITION OF THE KENTUCKY CABLE TELECOMMUNICATIONS ASSOCIATION FOR A DECLARATORY ORDER THAT THE COMMISSION HAS JURISDICTION TO REGULATE THE POLE ATTACHMENT RATES, TERMS AND CONDITIONS OF COOPERATIVES THAT PURCHASE ELECTRICITY FROM THE TENNESSEE VALLEY AUTHORITY CASE NO. 2012-00544

Response to KCTA's Supplemental Requests for Information dated December 2, 2013

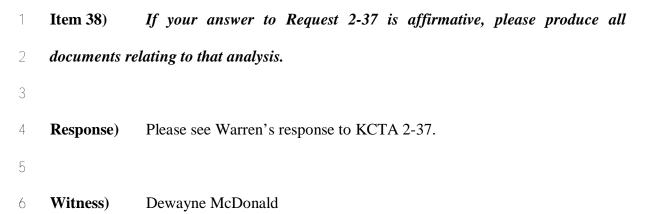
December 23, 2013

1	Item 37) Have you, or has anyone on your behalf, ever analyzed what your pole
2	attachment rates would be under the Federal Communication Commission's pole
3	attachment rate methodology used to determine the maximum just and reasonable rate
4	under 47 U.S.C. § 224(d)?
5	
6	Response) Warren objects to this request on the grounds that it is not reasonably
7	calculated to lead to the discovery of relevant and admissible evidence. Warren also
8	objects to this request on the grounds that cooperatively organized entities are exempt
9	from the 1978 Pole Attachment Act. Notwithstanding this objection, but without waiving
10	it, Warren states as follows.
11	Warren is not aware of any such analysis.
12	
13	Witness) Dewayne McDonald

Case No. 2012-00544
Warren Rural Electric Cooperative Corporation
Response to KCTA 2-37
Witness: Dewayne McDonald
Page 1 of 1

IN THE MATTER OF: PETITION OF THE KENTUCKY CABLE TELECOMMUNICATIONS ASSOCIATION FOR A DECLARATORY ORDER THAT THE COMMISSION HAS JURISDICTION TO REGULATE THE POLE ATTACHMENT RATES, TERMS AND CONDITIONS OF COOPERATIVES THAT PURCHASE ELECTRICITY FROM THE TENNESSEE VALLEY AUTHORITY CASE NO. 2012-00544

Response to KCTA's Supplemental Requests for Information dated December 2, 2013



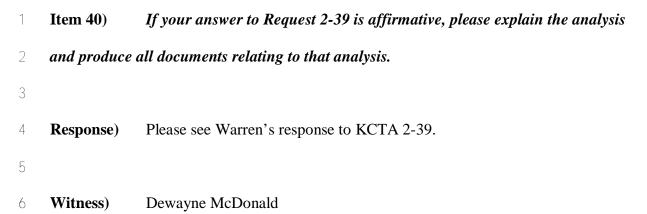
IN THE MATTER OF: PETITION OF THE KENTUCKY CABLE TELECOMMUNICATIONS ASSOCIATION FOR A DECLARATORY ORDER THAT THE COMMISSION HAS JURISDICTION TO REGULATE THE POLE ATTACHMENT RATES, TERMS AND CONDITIONS OF COOPERATIVES THAT PURCHASE ELECTRICITY FROM THE TENNESSEE VALLEY AUTHORITY CASE NO. 2012-00544

Response to KCTA's Second Requests for Information dated December 2, 2013

1	Item 39)	Have you, or has anyone on your behalf, ever determined if your pole		
2	attachment i	rates provide a subsidy to KCTA members?		
3				
4	Response)	Warren objects to this request on the grounds that it is not reasonably		
5	calculated to	lead to the discovery of relevant and admissible evidence. Notwithstanding		
6	this objection, but without waiving it, Warren states as follows.			
7	Warr	en has not alleged that its "pole attachment rates provide a subsidy to KCTA		
8	members."			
9				
10	Witness)	Dewayne McDonald		

IN THE MATTER OF: PETITION OF THE KENTUCKY CABLE TELECOMMUNICATIONS ASSOCIATION FOR A DECLARATORY ORDER THAT THE COMMISSION HAS JURISDICTION TO REGULATE THE POLE ATTACHMENT RATES, TERMS AND CONDITIONS OF COOPERATIVES THAT PURCHASE ELECTRICITY FROM THE TENNESSEE VALLEY AUTHORITY CASE NO. 2012-00544

Response to KCTA's Supplemental Requests for Information dated December 2, 2013



IN THE MATTER OF: PETITION OF THE KENTUCKY CABLE TELECOMMUNICATIONS ASSOCIATION FOR A DECLARATORY ORDER THAT THE COMMISSION HAS JURISDICTION TO REGULATE THE POLE ATTACHMENT RATES, TERMS AND CONDITIONS OF COOPERATIVES THAT PURCHASE ELECTRICITY FROM THE TENNESSEE VALLEY AUTHORITY CASE NO. 2012-00544

Response to KCTA's Supplemental Requests for Information dated December 2, 2013

December 23, 2013

1	Item 41) Produce your pole rates charged to Windstream and NewWave
2	Communications for each of the last ten years.
3	
4	Response) Warren objects to this request on the grounds that it is overly broad and
5	unduly burdensome. Warren also objects to this request on the grounds that it is not
6	reasonably calculated to lead to the discovery of relevant and admissible evidence.
7	Warren also objects on the grounds that it is duplicative of KCTA 1-9. Notwithstanding
8	these objections, but without waiving them, Warren states as follows.
9	Please see Warren's response to KCTA 1-9.
10	
11	Witness) Dewayne McDonald

Case No. 2012-00544
Warren Rural Electric Cooperative Corporation
Response to KCTA 2-41
Witness: Dewayne McDonald
Page 1 of 1

IN THE MATTER OF: PETITION OF THE KENTUCKY CABLE TELECOMMUNICATIONS ASSOCIATION FOR A DECLARATORY ORDER THAT THE COMMISSION HAS JURISDICTION TO REGULATE THE POLE ATTACHMENT RATES, TERMS AND CONDITIONS OF COOPERATIVES THAT PURCHASE ELECTRICITY FROM THE TENNESSEE VALLEY AUTHORITY CASE NO. 2012-00544

Response to KCTA's Supplemental Requests for Information dated December 2, 2013

December 23, 2013

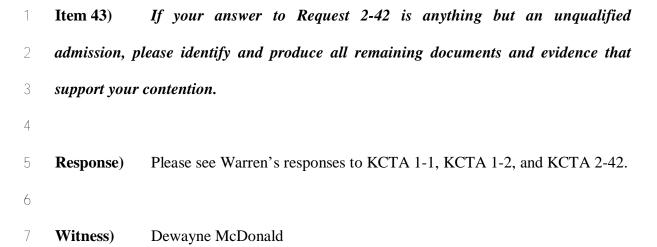
1	Item 42) Admit that your responses to KCTA's First Request for Information			
2	Numbers 1 and 2 contain all the evidence of which you are aware that supports your			
3	contention that TVA regulates your pole attachment rates.			
4				
5	Response) Warren objects to this request on the grounds that the civil rules pertaining			
6	to requests for admissions do not apply to data requests in Commission proceedings.			
7	Warren also objects to this request on the grounds that data requests are not "evidence."			
8	Warren also objects to this request on the grounds that the question presented by KCTA			
9	is a question of law, which requires no evidence to resolve. Notwithstanding these			
10	objections, but without waiving them, Warren states as follows.			
11	Please see Warren's responses to KCTA 1-1 and KCTA 1-2.			
12				
13	Witness) Dewayne McDonald			

Case No. 2012-00544
Warren Rural Electric Cooperative Corporation
Response to KCTA 2-42
Witness: Dewayne McDonald
Page 1 of 1

IN THE MATTER OF: PETITION OF THE KENTUCKY CABLE TELECOMMUNICATIONS ASSOCIATION FOR A DECLARATORY ORDER THAT THE COMMISSION HAS JURISDICTION TO REGULATE THE POLE ATTACHMENT RATES, TERMS AND CONDITIONS OF COOPERATIVES THAT PURCHASE ELECTRICITY FROM THE TENNESSEE VALLEY AUTHORITY CASE NO. 2012-00544

Response to KCTA's Supplemental Requests for Information dated December 2, 2013

December 23, 2013



Case No. 2012-00544
Warren Rural Electric Cooperative Corporation
Response to KCTA 2-43
Witness: Dewayne McDonald
Page 1 of 1

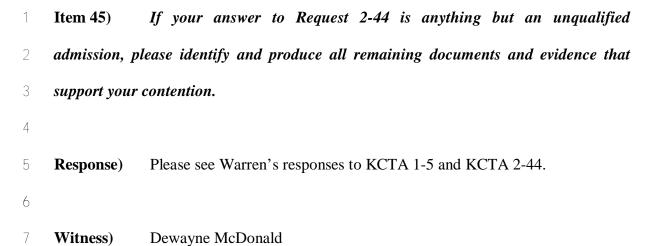
IN THE MATTER OF: PETITION OF THE KENTUCKY CABLE TELECOMMUNICATIONS ASSOCIATION FOR A DECLARATORY ORDER THAT THE COMMISSION HAS JURISDICTION TO REGULATE THE POLE ATTACHMENT RATES, TERMS AND CONDITIONS OF COOPERATIVES THAT PURCHASE ELECTRICITY FROM THE TENNESSEE VALLEY AUTHORITY CASE NO. 2012-00544

Response to KCTA's Supplemental Requests for Information dated December 2, 2013

1	Item 44) Admit that your responses to KCTA's First Request for Information			
2	Numbers 1-5 contain all the evidence of which you are aware that supports your			
3	contention that the Commission's regulation of your pole attachment rates would			
4	conflict with TVA's regulation of your electric rates.			
5				
6	Response) Warren objects to this request on the grounds that the civil rules pertaining			
7	to requests for admissions do not apply to data requests in Commission proceedings.			
8	Warren also objects to this request on the grounds that data requests are not "evidence."			
9	Warren also objects to this request on the grounds that the question presented by KCTA			
10	is a question of law, which requires no evidence to resolve. Notwithstanding these			
11	objections, but without waiving them, Warren states as follows.			
12	Please see Warren's response to KCTA 1-5.			
13				
14	Witness) Dewayne McDonald			

IN THE MATTER OF: PETITION OF THE KENTUCKY CABLE TELECOMMUNICATIONS ASSOCIATION FOR A DECLARATORY ORDER THAT THE COMMISSION HAS JURISDICTION TO REGULATE THE POLE ATTACHMENT RATES, TERMS AND CONDITIONS OF COOPERATIVES THAT PURCHASE ELECTRICITY FROM THE TENNESSEE VALLEY AUTHORITY CASE NO. 2012-00544

Response to KCTA's Supplemental Requests for Information dated December 2, 2013



IN THE MATTER OF: PETITION OF THE KENTUCKY CABLE TELECOMMUNICATIONS ASSOCIATION FOR A DECLARATORY ORDER THAT THE COMMISSION HAS JURISDICTION TO REGULATE THE POLE ATTACHMENT RATES, TERMS AND CONDITIONS OF COOPERATIVES THAT PURCHASE ELECTRICITY FROM THE TENNESSEE VALLEY AUTHORITY CASE NO. 2012-00544

Response to KCTA's Supplemental Requests for Information dated December 2, 2013

December 23, 2013

1	Item 46) Admit that your responses to KCTA's First Request for Information
2	Numbers 1-6 contain all the evidence of which you are aware concerning how you
3	ensure your pole attachment rates will ensure your customers do not subsidize
4	attaching entities.
5	
6	Response) Warren objects to this request on the grounds that the civil rules pertaining
7	to requests for admissions do not apply to data requests in Commission proceedings.
8	Warren also objects to this request on the grounds that data requests are not "evidence."
9	Warren also objects to this request on the grounds that the question presented by KCTA
10	is a question of law, which requires no evidence to resolve. Notwithstanding these
11	objections, but without waiving them, Warren states as follows.
12	Please see Warren's response to KCTA 1-6.
13	
14	Witness) Dewayne McDonald

Case No. 2012-00544
Warren Rural Electric Cooperative Corporation
Response to KCTA 2-46
Witness: Dewayne McDonald
Page 1 of 1

IN THE MATTER OF: PETITION OF THE KENTUCKY CABLE TELECOMMUNICATIONS ASSOCIATION FOR A DECLARATORY ORDER THAT THE COMMISSION HAS JURISDICTION TO REGULATE THE POLE ATTACHMENT RATES, TERMS AND CONDITIONS OF COOPERATIVES THAT PURCHASE ELECTRICITY FROM THE TENNESSEE VALLEY AUTHORITY CASE NO. 2012-00544

Response to KCTA's Supplemental Requests for Information dated December 2, 2013

	Item 47)	If your answer to Request 2-46 is anything but an unqualified		
2	admission, please identify and produce all remaining documents and evidence tha			
3	support your contention.			
4				
5	Response)	Please see Warren's responses to KCTA 1-6 and KCTA 2-46.		
6				
7	Witness)	Dewayne McDonald		

IN THE MATTER OF: PETITION OF THE KENTUCKY CABLE TELECOMMUNICATIONS ASSOCIATION FOR A DECLARATORY ORDER THAT THE COMMISSION HAS JURISDICTION TO REGULATE THE POLE ATTACHMENT RATES, TERMS AND CONDITIONS OF COOPERATIVES THAT PURCHASE ELECTRICITY FROM THE TENNESSEE VALLEY AUTHORITY CASE NO. 2012-00544

Response to KCTA's Supplemental Requests for Information dated December 2, 2013

December 23, 2013

1	Item 48)	Identify each increase or decrease in electric rates set by TVA that has
2	resulted from a	a change in your pole attachment revenues within the last ten years.
3		
4	Response)	Warren objects to this request on the grounds that is unduly burdensome.
5	Warren also ob	ojects to this request on the grounds that it is not reasonably calculated to
6	lead to the dis-	covery of relevant and admissible evidence. Warren also objects to this
7	request on the	grounds that the requested information is not in the custody or control of
8	Warren.	
9		
0	Witness)	Counsel

Case No. 2012-00544
Warren Rural Electric Cooperative Corporation
Response to KCTA 2-48
Witness: Counsel

Page 1 of 1

IN THE MATTER OF: PETITION OF THE KENTUCKY CABLE TELECOMMUNICATIONS ASSOCIATION FOR A DECLARATORY ORDER THAT THE COMMISSION HAS JURISDICTION TO REGULATE THE POLE ATTACHMENT RATES, TERMS AND CONDITIONS OF COOPERATIVES THAT PURCHASE ELECTRICITY FROM THE TENNESSEE VALLEY AUTHORITY CASE NO. 2012-00544

Response to KCTA's Supplemental Requests for Information dated December 2, 2013

December 23, 2013

1	Item 49)	Do you charge BellSouth for attachments to your secondary poles?
2		
3	Response)	Yes.
4		
5	Witness)	Dewayne McDonald

Case No. 2012-00544
Warren Rural Electric Cooperative Corporation
Response to KCTA 2-49
Witness: Dewayne McDonald
Page 1 of 1

IN THE MATTER OF: PETITION OF THE KENTUCKY CABLE TELECOMMUNICATIONS ASSOCIATION FOR A DECLARATORY ORDER THAT THE COMMISSION HAS JURISDICTION TO REGULATE THE POLE ATTACHMENT RATES, TERMS AND CONDITIONS OF COOPERATIVES THAT PURCHASE ELECTRICITY FROM THE TENNESSEE VALLEY AUTHORITY CASE NO. 2012-00544

Response to KCTA's Supplemental Requests for Information dated December 2, 2013

	Item 50)	Do you charge NewWave	Communications for	attachments	to your
2	secondary poles?				
3					
4	Response)	Yes.			
5					
6	Witness)	Dewayne McDonald			

IN THE MATTER OF: PETITION OF THE KENTUCKY CABLE TELECOMMUNICATIONS ASSOCIATION FOR A DECLARATORY ORDER THAT THE COMMISSION HAS JURISDICTION TO REGULATE THE POLE ATTACHMENT RATES, TERMS AND CONDITIONS OF COOPERATIVES THAT PURCHASE ELECTRICITY FROM THE TENNESSEE VALLEY AUTHORITY CASE NO. 2012-00544

Response to KCTA's Supplemental Requests for Information dated December 2, 2013

December 23, 2013

Have you, or has anyone on your behalf, discussed with TVA the 1 **Item 51**) 2 possibility that someone from TVA may testify on your behalf? 3 4 Response) Warren objects to this request on the grounds that it is not reasonably 5 calculated to lead to the discovery of relevant and admissible evidence. Warren also objects to this request on the grounds that it is premature in light of the fact that discovery 6 7 is ongoing and no decision regarding potential witnesses has been made. Warren will 8 identify its witnesses, if any, in accordance with the Commission's scheduling orders. 9 Witness) Counsel 10

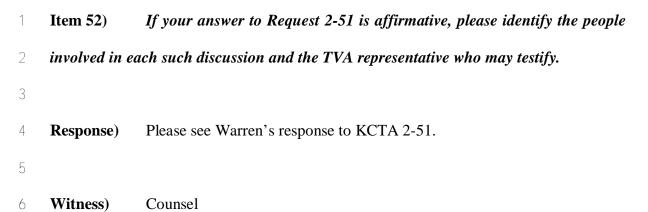
Case No. 2012-00544
Warren Rural Electric Cooperative Corporation
Response to KCTA 2-51
Witness: Counsel

Page 1 of 1

IN THE MATTER OF: PETITION OF THE KENTUCKY CABLE TELECOMMUNICATIONS ASSOCIATION FOR A DECLARATORY ORDER THAT THE COMMISSION HAS JURISDICTION TO REGULATE THE POLE ATTACHMENT RATES, TERMS AND CONDITIONS OF COOPERATIVES THAT PURCHASE ELECTRICITY FROM THE TENNESSEE VALLEY AUTHORITY CASE NO. 2012-00544

Response to KCTA's Second Requests for Information dated December 2, 2013

December 23, 2013



Case No. 2012-00544
Warren Rural Electric Cooperative Corporation
Response to KCTA 2-52
Witness: Counsel

Page 1 of 1