

# Exhibit 4

**HICKMAN-FULTON COUNTIES RURAL ELECTRIC COOPERATIVE  
CORPORATION**

**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 First Requests for Information  
dated October 24, 2013**

**November 14, 2013**

- 1 **Item 1)**      *Do you contend that the TVA regulates your pole rates in any way?*  
2  
3 **Response)**    Yes.  
4  
5 **Witness)**      Debbie Weatherford

HICKMAN-FULTON COUNTIES RURAL ELECTRIC COOPERATIVE CORPORATION

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 First Requests for Information dated October 24, 2013

November 14, 2013

1    **Item 2)**        *If the answer to the prior data request is affirmative, please explain*  
2    *fully, making reference to all facts known to you supporting that answer.*

3

4    **Response)**     Hickman-Fulton objects to this request insofar as it seeks conclusions of a  
5    legal nature which are protected by the attorney-client and attorney-work-product  
6    privileges. Hickman-Fulton also objects to this request on the grounds that it is overly  
7    broad and unduly burdensome. Notwithstanding these objections, but without waiving  
8    them, Hickman-Fulton states as follows.

9            By statute, the TVA has plenary authority over all rates and services of the  
10    utilities that purchase and distribute the electricity it generates. The TVA regulates these  
11    rates and services through the express terms of its wholesale power contract with  
12    Hickman-Fulton. Please also see the TVA Cooperatives' Response to the January 17  
13    Order filed February 15, 2013 in this matter, and the Response to Application for  
14    Rehearing filed July 25, 2013 in this matter.

15

16   **Witness)**     Debbie Weatherford

Case No. 2012-00544  
Hickman-Fulton Counties Rural Electric Cooperative Corporation  
Response to KCTA 1-2  
Witness: Debbie Weatherford  
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**PENNYRILE RURAL ELECTRIC COOPERATIVE CORPORATION**

**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 First Requests for Information  
dated October 24, 2013**

**November 14, 2013**

- 1 **Item 1)**      *Do you contend that the TVA regulates your pole rates in any way?*  
2  
3 **Response)**    Yes.  
4  
5 **Witness)**      Eston Glover

**PENNYRILE RURAL ELECTRIC COOPERATIVE CORPORATION**

**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 First Requests for Information  
dated October 24, 2013**

**November 14, 2013**

1 **Item 2)** *If the answer to the prior data request is affirmative, please explain*  
2 *fully, making reference to all facts known to you supporting that answer.*

3

4 **Response)** Pennyrile objects to this request insofar as it seeks conclusions of a legal  
5 nature which are protected by the attorney-client and attorney-work-product privileges.  
6 Pennyrile also objects to this request on the grounds that it is overly broad and unduly  
7 burdensome. Notwithstanding these objections, but without waiving them, Pennyrile  
8 states as follows.

9 By statute, the TVA has plenary authority over all rates and services of the  
10 utilities that purchase and distribute the electricity it generates. The TVA regulates these  
11 rates and services through the express terms of its wholesale power contract with  
12 Pennyrile. Please also see the TVA Cooperatives' Response to the January 17 Order  
13 filed February 15, 2013 in this matter, and the Response to Application for Rehearing  
14 filed July 25, 2013 in this matter.

15

16 **Witness)** Eston Glover

**Case No. 2012-00544  
Pennyrile Rural Electric Cooperative Corporation  
Response to KCTA 1-2  
Witness: Eston Glover  
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**TRI-COUNTY ELECTRIC MEMBERSHIP CORPORATION**

**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 First Requests for Information  
dated October 24, 2013**

**November 14, 2013**

- 1 **Item 1)**      *Do you contend that the TVA regulates your pole rates in any way?*
- 2
- 3 **Response)**    Yes.
- 4
- 5 **Witness)**     Paul Thompson

**TRI-COUNTY ELECTRIC MEMBERSHIP CORPORATION**

**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 First Requests for Information  
dated October 24, 2013**

**November 14, 2013**

1 **Item 2)** *If the answer to the prior data request is affirmative, please explain*  
2 *fully, making reference to all facts known to you supporting that answer.*

3

4 **Response)** Tri-County objects to this request insofar as it seeks conclusions of a legal  
5 nature which are protected by the attorney-client and attorney-work-product privileges.  
6 Tri-County also objects to this request on the grounds that it is overly broad and unduly  
7 burdensome. Notwithstanding these objections, but without waiving them, Tri-County  
8 states as follows.

9 By statute, the TVA has plenary authority over all rates and services of the  
10 utilities that purchase and distribute the electricity it generates. The TVA regulates these  
11 rates and services through the express terms of its wholesale power contract with Tri-  
12 County. Please also see the TVA Cooperatives' Response to the January 17 Order filed  
13 February 15, 2013 in this matter, and the Response to Application for Rehearing filed  
14 July 25, 2013 in this matter.

15

16 **Witness)** Paul Thompson

**Case No. 2012-00544  
Tri-County Electric Membership Corporation  
Response to KCTA 1-2  
Witness: Paul Thompson  
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**WARREN RURAL ELECTRIC COOPERATIVE CORPORATION**

**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 First Requests for Information  
dated October 24, 2013**

**November 14, 2013**

- 1 **Item 1)**      *Do you contend that the TVA regulates your pole rates in any way?*  
2  
3 **Response)**    Yes.  
4  
5 **Witness)**     Dewayne McDonald



**WARREN RURAL ELECTRIC COOPERATIVE CORPORATION**

**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 First Requests for Information  
dated October 24, 2013**

**November 14, 2013**

1 **Item 2)** *If the answer to the prior data request is affirmative, please explain*  
2 *fully, making reference to all facts known to you supporting that answer.*

3

4 **Response)** Warren objects to this request insofar as it seeks conclusions of a legal  
5 nature which are protected by the attorney-client and attorney-work-product privileges.  
6 Warren also objects to this request on the grounds that it is overly broad and unduly  
7 burdensome. Notwithstanding these objections, but without waiving them, Warren states  
8 as follows.

9 By statute, the TVA has plenary authority over all rates and services of the  
10 utilities which purchase and distribute the electricity it generates. The TVA regulates  
11 these rates and services through the express terms of its wholesale power contract with  
12 Warren. Please also see the TVA Cooperatives' Response to the January 17 Order filed  
13 February 15, 2013 in this matter, and the Response to Application for Rehearing filed  
14 July 25, 2013 in this matter.

15

16 **Witness)** Dewayne McDonald

**Case No. 2012-00544  
Warren Rural Electric Cooperative Corporation  
Response to KCTA 1-2  
Witness: Dewayne McDonald  
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**WEST KENTUCKY RURAL ELECTRIC COOPERATIVE CORPORATION**

**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 First Requests for Information  
dated October 24, 2013**

**November 14, 2013**

- 1 **Item 1)**      *Do you contend that the TVA regulates your pole rates in any way?*  
2  
3 **Response)**    Yes.  
4  
5 **Witness)**     David Smart

**WEST KENTUCKY RURAL ELECTRIC COOPERATIVE CORPORATION**

**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 First Requests for Information  
dated October 24, 2013**

**November 14, 2013**

1 **Item 2)** *If the answer to the prior data request is affirmative, please explain*  
2 *fully, making reference to all facts known to you supporting that answer.*

3

4 **Response)** West Kentucky objects to this request insofar as it seeks conclusions of a  
5 legal nature which are protected by the attorney-client and attorney-work-product  
6 privileges. West Kentucky also objects to this request on the grounds that it is overly  
7 broad and unduly burdensome. Notwithstanding these objections, but without waiving  
8 them, West Kentucky states as follows.

9 By statute, the TVA has plenary authority over all rates and services of the  
10 utilities which purchase and distribute the electricity it generates. The TVA regulates  
11 these rates and services through the express terms of its wholesale power contract with  
12 West Kentucky. Please also see the TVA Cooperatives' Response to the January 17  
13 Order filed February 15, 2013 in this matter, and the Response to Application for  
14 Rehearing filed July 25, 2013 in this matter.

15

16 **Witness)** David Smart

**Case No. 2012-00544  
West Kentucky Rural Electric Cooperative Corporation  
Response to KCTA 1-2  
Witness: David Smart  
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