

**COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION**

In the Matter of:

**APPLICATION OF BLUE GRASS ENERGY)
COOPERATIVE CORPORATION FOR AN) CASE NO. 2014-00339
ADJUSTMENT OF RATES)**

**SUPPLEMENTAL RESPONSE TO ATTORNEY GENERAL'S SECOND REQUEST
FOR INFORMATION TO BLUE GRASS ENERGY COOPERATIVE CORPORATION
DATED FEBRUARY 17, 2015
[REQUESTS 5, 12, and 24]**

BLUE GRASS ENERGY COOPERATIVE CORPORATION
PSC CASE NO. 2014-00339
SUPPLEMENTAL RESPONSE TO INFORMATION REQUEST

ATTORNEY GENERAL'S SECOND REQUEST FOR INFORMATION DATED 2/17/15

RESPONSIBLE PARTY: Donald Smothers

Request 5. Reference the response to AG 1-2. This response is non-responsive and inadequate. PSC2-20 does not provide the requested information. Provide all invoices as originally requested and provide these on an ongoing basis.

Response 5. Invoices relating to the preparation of the rate case are attached to this Item [attachments omitted for purposes of this supplemental response].

Supplemental Response 5. Please see Blue Grass Energy's Supplemental Response to the Attorney General's First Request for Information, Request No. 2.

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Request 12. Please reference the response to AG 1-8(b) and provide the Net TIER and OTIER for 2014 as requested. If not available as indicated in the Response, please provide a full explanation as to why it is not available.

Response 12. We are not required to file our final RUS form 7, financial statistical analysis, for December 31, 2014 until March 31, 2015. However our preliminary projection reflects a 1.65 OTIER and 1.72 net TIER for 2014.

Supplemental Response 12. Because information related to calendar year 2014 is now available, Blue Grass Energy states that, for calendar year 2014, its Net TIER was 1.78 and its OTIER was 1.65.

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Request 24. Please refer to AG 1-31, 32, 41, 46, 47, and 51 and explain why 2014 calendar year information not available? Explain the answer in full detail. Consider these requests ongoing and provide the information as soon as it is available.

Response 24. The financial data for our RUS form 7 is not required to be filed until March 31, 2015. However we can provide a projection of the data requested. Data for 2013 is included in Exhibit K of the application. A projection of 2014 is: [figures omitted for purposes of this supplemental response].

Supplemental Response 24. Except for AG 1-51, Blue Grass Energy has provided supplemental responses to each of the Attorney General's referenced requests. The information requested in AG 1-51 (*i.e.*, a version of Exhibit 17 to Blue Grass Energy's Application that reflects calendar year 2014) remains unavailable at this time, as the relevant statistical comparisons are not released until approximately June of the following calendar year.