

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

In the Matter of:

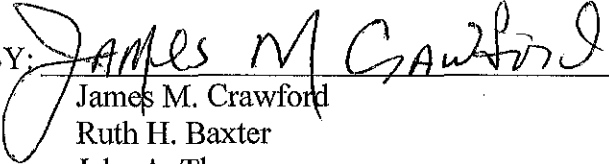
THE APPLICATION OF SOUTH KENTUCKY RURAL)
ELECTRIC COOPERATIVE CORPORATION FOR) Case No. 2018-00050
APPROVAL OF MASTER POWER PURCHASE AND)
SALE AGREEMENT AND TRANSACTIONS THEREUNDER)

**SUPPLEMENTAL RESPONSE OF SHELBY ENERGY COOPERATIVE, INC.
TO SOUTH KENTUCKY RURAL ELECTRIC COOPERATIVE CORPORATION'S
REQUESTS FOR INFORMATION**

Respectfully submitted,

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BY: 
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CERTIFICATE OF SERVICE

Pursuant to 807 KAR 5:001 Section 6, the undersigned certifies that consistent with 807 KAR 5:001 Section 4(8)(d)(3), a copy of this document has been electronically served upon the following on this the 30th day of April, 2018:

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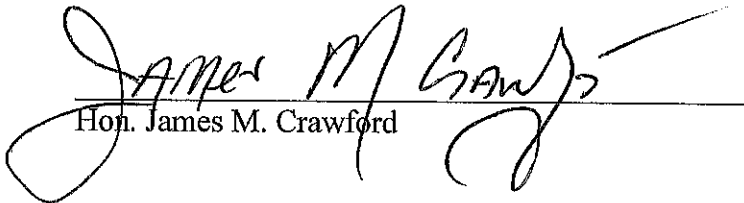
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Hon. James M. Crawford

Witness: Debra Martin

Shelby Energy Cooperative, Inc.

Case No. 2018-00050

South Kentucky Rural Electric Cooperative Corporation

4. Please produce all email communications sent or received by and between any of the Distribution Cooperatives **during the period November 28, 2017 through February 23, 2018** that reference South Kentucky (as defined in the instructions) or that relate in any way to Amendment 3, the MOU or the potential or actual exercise of rights by South Kentucky under Amendment 3 and/or the MOU.

Response: The responding parties object to this request to the extent it seeks production of emails concerning potential intervention in this matter, selection of counsel in this matter, or sharing of costs relating to this matter because those subjects are not relevant to the issues in this case and the information sought is not reasonably calculated to lead to the discovery of admissible evidence in this case; and the parties have not produced emails relevant to these three subjects. The responding parties object to this request to the extent it asks for emails concerning any of the parties pursuing a request for proposals (“RFPs”) for a power purchase agreement with an Alternate Source under Amendment 3 and the MOU because this subject is not relevant to the issues in this case and the information sought is not reasonably calculated to lead to the discovery of admissible evidence in this case; but without waiving this objection, the parties state that some of them have pursued an RFP and will provide emails on that subject, but will not provide emails that disclose the identity of any parties responding to the RFP, the information provided by those parties, or documents provided by the consultant retained by them to assist with the RFP process because that information is not relevant to the issues in this case and the information sought is not reasonably calculated to lead to the discovery of admissible evidence in this case. The

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Witness: Debra Martin

responding parties also object because the request is overly broad as many, if not all, of the emails that are the subject of this request are irrelevant to this proceeding, and it is unduly burdensome to require the parties to search for and produce these emails. Without waiving these objections, the responding parties provide the following response.

In regard to Shelby Energy's supplemental response to e-mail communications, see Attachment #2A.