

South Kentucky Rural Electric Cooperative Corporation

Case No. 2018-00050

Distribution Cooperatives Second Request for Information

39. Please refer to South Kentucky's response to DC 1-4. Are there any documents responsive to this request for information that were not produced by South Kentucky in its response dated March 13, 2018? If so, please provide a copy of those documents.

Response:

South Kentucky renews its objection to this request as vague and overly broad, encompassing information not relevant to the subject matter of this proceeding or any related interest of the Distribution Cooperatives (not being members of South Kentucky), and encompassing information protected by the attorney-client privilege and work product doctrine. Without waiving the foregoing, reference is made to Attachment DC#2-39, which includes what South Kentucky believes to be any remaining documents responsive to this request that are not otherwise protected from disclosure as attorney-client communications and work product. This Attachment contains confidential information and is subject to a motion for confidential treatment. A redacted Public version and an unredacted Confidential version are being filed with the Commission. In addition, confidential information pervades several files associated with the Attachment. Those items are being filed with the Commission under seal.