1 2 3	COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION OF KENTUCKY
4 5 6	
7	In the Matter of:
8 9 10 11 12 13 14 15	THE APPLICATION OF SOUTH KENTUCKY RURAL) ELECTRIC COOPERATIVE CORPORATION) Case No. FOR APPROVAL OF MASTER POWER) 2018-00050 PURCHASE AND SALE AGREEMENT AND) TRANSACTIONS THEREUNDER)
16 17	POST-HEARING REQUEST FOR INFORMATION TO
18 19	SOUTH KENTUCKY RURAL ELECTRIC COOPERATIVE CORPORATION FROM JOINT INTERVENORS
20	FROM JOINT INTERVENORS
21 22	This post-hearing request for information in this proceeding is propounded to South
23	Kentucky Rural Electric Cooperative Corporation ("South Kentucky") by the following East
24	Kentucky Power Cooperative (" <u>EKPC</u> ") member distribution cooperatives: Big Sandy Rural
25	Electric Cooperative Corporation, Blue Grass Energy Cooperative Corporation, Clark Energy
26	Cooperative, Inc., Cumberland Valley Electric, Inc., Farmers Rural Electric Cooperative
27	Corporation, Fleming-Mason Energy Cooperative, Inc., Inter-County Energy Cooperative
28	Corporation, Licking Valley Rural Electric Cooperative Corporation, and Nolin Rural Electric
29	Cooperative Corporation ("Distribution Cooperatives"). The Distribution Cooperatives request
30	that South Kentucky answer this information request in accordance with the following
31	Definitions and Instructions.
32	<u>DEFINITIONS</u>
33	1. Whenever it is necessary to bring within the scope of these information requests
34	documents that otherwise might be construed to be outside their scope (1) the use of "and" as

- well as "or" shall be construed both disjunctively and conjunctively; (2) the use of a word in its
- 2 singular form shall be construed to include within its meaning its plural form as well, and vice
- 3 versa; (3) the use of "include" and "including" shall be construed to mean "without limitation";
- 4 and (4) the use of a verb in any tense or voice shall be construed as the use of that verb in all
- 5 other tenses and voices.
- 6 2. "Document" means any written, recorded, transcribed, printed or impressed
- 7 matter of whatever kind, however produced, stored or reproduced, including, but not limited to,
- 8 sound or pictorial recordings, computerized information, books, pamphlets, letters, memoranda,
- 9 telegrams, electronic or mechanical transmissions, communications of all kinds, reports, notes,
- 10 working papers, handwritings, charts, papers, writings, printings, transcriptions, tapes and
- 11 records of all kinds. Document includes, without limitation, all workpapers produced by or
- relied upon by the witness.
- 3. "RUS" means the Rural Utilities Service of the United States Department of
- 14 Agriculture.

15 <u>INSTRUCTIONS</u>

- 16 1. If any Document called for by any information request is withheld based upon a
- claim of privilege or work product, please produce so much of the Document as to which you do
- 18 not claim privilege or protection, and for each Document or part of a Document for which you
- 19 claim privilege or protection, describe or identify:
- 20 a. The nature, subject matter and substance of the Document or part of the
- 21 Document withheld;
- b. The nature of the privilege or protection claimed;

Ţ	c. The date, author or authors, addressee or addressees, and distribution of
2	the Document; and
3	d. Each person who is or has been in possession, custody or control any copy
4	of the Document.
5	2. If, for reasons other than a claim of privilege or work product, you refuse to
6	answer any information request or to produce any Document requested, state the grounds upon
7	which the refusal is based with sufficient specificity to permit a determination of the propriety of
8	such refusal.
9	3. If any copy of any Document requested herein or any record which refers or
0	relates to any Document requested herein has been destroyed or lost, set forth to the extent
1	possible the content of each such Document, the date such Document and its copies were
2	destroyed or lost and, if destroyed, the identity of the person authorizing such destruction, and
.3	the identity of the last known custodian of such Document prior to its destruction.
4	4. This information request shall be deemed continuing and you should serve upon
.5	the Distribution Cooperatives' counsel (1) supplemental responses to this information request if
6	additional information or information that changes your response to this information request is
7	obtained during the course of this proceeding, and (2) any Documents requested herein that
8	become available or that are discovered after the date your response to this information request is
9	due.
20	POST-HEARING INFORMATION REQUEST
21	1. Please provide a copy of South Kentucky's 0054-BD8-Wayne RUS Loan Contract
22	dated November 1, 2016
)3	On this the 21st day of May 2018

Respectfully submitted,

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