

1  
2 COMMONWEALTH OF KENTUCKY  
3 BEFORE THE PUBLIC SERVICE COMMISSION OF KENTUCKY  
4  
5

6  
7 In the Matter of:

8  
9 THE APPLICATION OF SOUTH KENTUCKY RURAL )  
10 ELECTRIC COOPERATIVE CORPORATION ) Case No.  
11 FOR APPROVAL OF MASTER POWER ) 2018-00050  
12 PURCHASE AND SALE AGREEMENT AND )  
13 TRANSACTIONS THEREUNDER )  
14  
15  
16

17 **POST-HEARING REQUEST FOR INFORMATION TO**  
18 **SOUTH KENTUCKY RURAL ELECTRIC COOPERATIVE CORPORATION**  
19 **FROM JOINT INTERVENORS**  
20  
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 ("EKPC") 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 **DEFINITIONS**

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

1 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  
12 relied upon by the witness.

13 3. “RUS” means the Rural Utilities Service of the United States Department of  
14 Agriculture.

#### 15 INSTRUCTIONS

16 1. If any Document called for by any information request is withheld based upon a  
17 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;

22 b. The nature of the privilege or protection claimed;



1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26

Respectfully submitted,



James M. Miller  
R. Michael Sullivan  
Sullivan Mountjoy, PSC  
100 St. Ann Street  
P. O. Box 727  
Owensboro, Kentucky 42302-0727  
Phone: (270) 926-4000  
Facsimile: (270) 683-6694  
[jmiller@smlegal.com](mailto:jmiller@smlegal.com)  
[msullivan@smlegal.com](mailto:msullivan@smlegal.com)

*Counsel for Big Sandy Rural Electric  
Cooperative Corporation, Blue Grass  
Energy Cooperative Corporation, Clark  
Energy Cooperative, Inc., Cumberland  
Valley Electric, Inc., Farmers Rural Electric  
Cooperative Corporation, Fleming-Mason  
Energy Cooperative, Inc., Inter-County  
Energy Cooperative Corporation, Licking  
Valley Rural Electric Cooperative  
Corporation, and Nolin Rural Electric  
Cooperative Corporation*