

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

IN THE MATTER OF:

APPLICATION OF KENERGY CORP. FOR A)	CASE NO.
WAIVER PURSUANT TO KRS 278.2219)	2020-00215

**NOTICE OF FILING UNREDACTED DATA RESPONSES AND
TESTIMONY DEEMED NOT CONFIDENTIAL**

KENERGY CORP., in compliance with the Commission's orders of October 22, 2020, and October 26, 2020, files the attached unredacted data request responses and testimony:

- 1) Exhibit 1 – Staff Data Request 4(c)
- 2) Exhibit 2 – Attorney General Data Request Responses 6(a) and (c)
- 3) Exhibit 3 – Chambers testimony
- 4) Exhibit 4 – Hohn Supplemental Testimony questions 6, 9, 12, 13 and 15

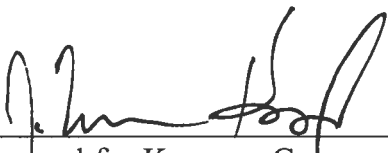
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By _____


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CERTIFICATE OF SERVICE

I hereby certify that the foregoing was served by electronic filing to the Kentucky Public Service Commission, 211 Sower Blvd., Frankfort, KY 40602 with a copy served electronically to the Kentucky Attorney General, Office of Rate Intervention, 700 Capital Avenue, Suite 20, Frankfort, KY 40601-8204, on this 23rd day of November, 2020.



Counsel for Kenergy Corp.

EXHIBIT 1

KENERGY CORP. RESPONSE TO COMMISSION'S DATA REQUEST FOR INFORMATION OF AUGUST 20, 2020

1 **Item 4**

2

3 **Item c)** Identify potential sources of grant funding for the project.

4 **RESPONSE)** Rural Development Opportunity Funding ("RDOF") which is
5 referenced herein as "government subsidy" and referenced in the application
6 less artfully as "grants".

7
8 **WITNESS)** Jeff Hohn

9

EXHIBIT 2

**KENERGY CORP. RESPONSE TO ATTORNEY GENERAL'S
DATA REQUEST OF
AUGUST 24, 2020**

1 **Item 6)** Refer to the application, paragraph 8, and the testimony of Jeffrey Hohn,
2 page 2, lines 24 – 26:
3

4 **Item a)** Provide a list of current grants that remedy the rural internet access issues,
5 and provide a detailed description of each grant, including the monetary
6 amounts of each, and whether Kenect will attempt to obtain each grant.
7

8 **RESPONSE)** The Rural Development Opportunity Fund (“RDOF”) is a government
9 subsidy identified as a “grant” in the application. The monetary amount
10 depends upon the results of the upcoming auctions. Kenect needs
11 to represent that it can post a letter of credit in order to participate in the
12 auction.

13

14
15
16 **Item c)** Provide a detailed list of all grants that for which Kenect plans to apply, if
17 any, along with the monetary amounts of each.
18

19 **RESPONSE)** The RDOF is the only government subsidy or grant sought. The amount
20 is indeterminate at this time
21

22 **WITNESS)** Travis Siewert
23