

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

**In the Matter of:**

**ELECTRONIC APPLICATION OF )  
KENERGY CORP. FOR A CERTIFICATE )  
OF PUBLIC CONVENIENCE AND )  
NECESSITY FOR THE CONSTRUCTION )  
OF A HIGH-SPEED FIBER NETWORK )  
AND FOR APPROVAL OF THE LEASING ) Case No. 2021-00365  
OF THE NETWORK'S EXCESS CAPACITY )  
TO AN AFFILIATE TO BE ENGAGED )  
IN THE PROVISION OF BROADBAND )  
SERVICE TO UNSERVED AND UNDERSERVED )  
HOUSEHOLDS AND BUSINESSES OF )  
THE COMMONWEALTH )**

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**ATTORNEY GENERAL'S SUPPLEMENTAL DATA REQUESTS**

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Comes now the intervenor, the Attorney General of the Commonwealth of Kentucky, by and through his Office of Rate Intervention (“Attorney General”), and submits these Data Requests to Kenergy Corp. (hereinafter “Kenergy” or “company”) to be answered by January 7, 2022, and in accord with the following<sup>1</sup>:

- (1) In each case where a request seeks data provided in response to a staff request, reference to the appropriate requested item will be deemed a satisfactory response.
- (2) Identify the witness who will be prepared to answer questions concerning each request.
- (3) Repeat the question to which each response is intended to refer.
- (4) These requests shall be deemed continuing so as to require further and supplemental

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<sup>1</sup> The Attorney General reserves the right to supplement these requests by the ordered deadline if the deadline for submitting supplemental requests is extended.

responses if the companies receive or generate additional information within the scope of these requests between the time of the response and the time of any hearing conducted hereon.

(5) Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association, be accompanied by a signed certification of the preparer or person supervising the preparation of the response on behalf of the entity that the response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

(6) If you believe any request appears confusing, please request clarification directly from undersigned Counsel for the Office of Attorney General.

(7) To the extent that the specific document, workpaper or information as requested does not exist, but a similar document, workpaper or information does exist, provide the similar document, workpaper, or information.

(8) To the extent that any request may be answered by way of a computer printout, please identify each variable contained in the printout which would not be self-evident to a person not familiar with the printout.

(9) If the company has objections to any request on the grounds that the requested information is proprietary in nature, or for any other reason, notify the Office of the Attorney General as soon as possible, and in accordance with Commission direction.

(10) As used herein, the words "document" or "documents" are to be construed broadly and shall mean the original of the same (and all non-identical copies or drafts thereof) and if the original is not available, the best copy available. These terms shall include all information recorded in any written, graphic or other tangible form and shall include,

without limiting the generality of the foregoing, all reports; memoranda; books or notebooks; written or recorded statements, interviews, affidavits and depositions; all letters or correspondence; telegrams, cables and telex messages; contracts, leases, insurance policies or other agreements; warnings and caution/hazard notices or labels; mechanical and electronic recordings and all information so stored, or transcripts of such recordings; calendars, appointment books, schedules, agendas and diary entries; notes or memoranda of conversations (telephonic or otherwise), meetings or conferences; legal pleadings and transcripts of legal proceedings; maps, models, charts, diagrams, graphs and other demonstrative materials; financial statements, annual reports, balance sheets and other accounting records; quotations or offers; bulletins, newsletters, pamphlets, brochures and all other similar publications; summaries or compilations of data; deeds, titles, or other instruments of ownership; blueprints and specifications; manuals, guidelines, regulations, procedures, policies and instructional materials of any type; photographs or pictures, film, microfilm and microfiche; videotapes; articles; announcements and notices of any type; surveys, studies, evaluations, tests and all research and development (R&D) materials; newspaper clippings and press releases; time cards, employee schedules or rosters, and other payroll records; cancelled checks, invoices, bills and receipts; and writings of any kind and all other tangible things upon which any handwriting, typing, printing, drawings, representations, graphic matter, magnetic or electrical impulses, or other forms of communication are recorded or produced, including audio and video recordings, computer stored information (whether or not in printout form), computer-readable media or other electronically maintained or transmitted information regardless of the media or format in which they are stored, and all other rough drafts, revised drafts (including all handwritten

notes or other marks on the same) and copies of documents as hereinbefore defined by whatever means made.

(11) For any document withheld on the basis of privilege, state the following: date; author; addressee; indicated or blind copies; all persons to whom distributed, shown, or explained; and, the nature and legal basis for the privilege asserted.

(12) In the event any document called for has been destroyed or transferred beyond the control of the company, please state: the identity of the person by whom it was destroyed or transferred, and the person authorizing the destruction or transfer; the time, place, and method of destruction or transfer; and, the reason(s) for its destruction or transfer. If destroyed or disposed of by operation of a retention policy, state the retention policy.

(13) Provide written responses, together with any and all exhibits pertaining thereto, in one or more bound volumes, separately indexed and tabbed by each response, in compliance with Kentucky Public Service Commission Regulations.

(14) “And” and “or” should be considered to be both conjunctive and disjunctive, unless specifically stated otherwise.

(15) “Each” and “any” should be considered to be both singular and plural, unless specifically stated otherwise.

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Respectfully submitted,

DANIEL J. CAMERON  
ATTORNEY GENERAL

A handwritten signature in blue ink that reads "J. Michael West". The signature is fluid and cursive, with a long horizontal stroke at the end.

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*Certificate of Service and Filing*

Pursuant to the Commission's Orders and in accord with all other applicable law, Counsel certifies that, on December 21, 2021, an electronic copy of the forgoing was served by e-mail to the following.

J. Christopher Hopgood  
[chopgood@dkgnlaw.com](mailto:chopgood@dkgnlaw.com)

this 21st day of December, 2021.

A handwritten signature in blue ink, appearing to read "J. Michael West". The signature is written in a cursive style with a horizontal line extending from the end.

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Assistant Attorney General

ELECTRONIC APPLICATION OF KENERGY CORP. FOR A CERTIFICATE OF PUBLIC CONVENIENCE AND NECESSITY FOR THE CONSTRUCTION OF A HIGH-SPEED FIBER NETWORK AND FOR APPROVAL OF THE LEASING OF THE NETWORK'S EXCESS CAPACITY TO AN AFFILIATE TO BE ENGAGED IN THE PROVISION OF BROADBAND SERVICE TO UNSERVED AND UNDERSERVED HOUSEHOLDS AND BUSINESSES OF THE COMMONWEALTH, Case No. 2021-00365

**Data Requests**

1. See response to AD DR 1-3. If Kenergy uses RUS funds for this purpose, will that negatively impact Kenergy's ability to obtain additional RUS funding for other projects as necessary to meet the needs of Kenergy's core function of providing electric service.