

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

THE ELECTRONIC APPLICATION OF)	
JACKSON PURCHASE ENERGY CORPORATION)	CASE NO.
FOR A GENERAL ADJUSTMENT OF RATES)	2024-00085

**JACKSON PURCHASE ENERGY CORPORATION’S REQUEST FOR
INFORMATION TO THE ATTORNEY GENERAL OF THE
COMMONWEALTH OF KENTUCKY**

I. DEFINITIONS AND INSTRUCTIONS

1. With respect to each discovery request, all information is to be divulged that is within the knowledge, possession or control of the parties to whom it is addressed, including their agents, employees, advisors, consultants, attorneys and/or investigators.
2. Please identify the witness(es) who will be prepared to answer questions concerning each request.
3. These requests shall be deemed continuing so as to require further and supplemental responses if the party receives or generates additional information within the scope of these requests between the time of the response and the time of any hearing conducted hereon.
4. All answers must be separately and fully stated in writing under oath.
5. Where a data request calls for an answer in more than one part, each part should be separated in the answer so that the answer is clearly understandable.
6. If any request appears confusing, please request clarification directly from counsel for Jackson Purchase Energy Corporation, (“Jackson Purchase”).

7. For purpose of these discovery requests, the following terms shall have meanings set forth below:

(a) As used herein, “document,” “documentation” and/or “record,” whether stated as the singular or the plural, means any course of binders, book, pamphlet, periodical, letter, correspondence, memoranda, including but not limited to, any memorandum or report of a meeting or telephone or other conversation, invoice, account, credit memo, debit memo, financial statement, general ledger, ledger, journal, work papers, account work papers, report, diary, telegram, record, contract, agreement, study, draft, telex, handwritten or other note, sketch, picture, photograph, plan, chart, paper, graph, index, tape, data processing card, data processing disc, data cells or sheet, check acceptance draft, e-mail, studies, analyses, contracts, estimates, summaries, statistical statements, analytical records, reports and/or summaries of investigations, opinions or reports of consultants, opinions or reports of accountants, trade letters, comparisons, brochures, pamphlets, circulars, bulletins, notices, forecasts, electronic communication, printouts, all other data compilations from which information can be obtained (translated if necessary by defendants into usable form), any preliminary versions, drafts or revisions of any of the foregoing, and/or any other written, recorded, transcribed, punched, taped, filmed or graphic matter, however produced or reproduced and regardless of origin or location, in the possession, custody and/or control of the defendant and/or their agents, accountants, employees, representatives and/or attorneys. “Document” and “record” also mean all copies of documents by whatever means made, if the copy bears any other markings or notations not found on the original.

(b) The terms “relating to,” “referring to,” “referred to,” “pertaining to,” “pertained to” and “relates to” means referring to, reporting, embodying, establishing, evidencing,

comprising, connected with, commenting on, responding to, showing, describing, analyzing, reflecting, presenting and/or constituting and/or in any way involving.

(c) The terms “and,” “or,” and “and/or” within the meaning of this document shall include each other and shall be both inclusive and disjunctive and shall be construed to require production of all documents, as above-described, in the broadest possible fashion and manner.

(d) The terms “AG” and “Company” shall mean the Attorney General of Kentucky Office of Rate Intervention, and shall include, but is not limited to, each and every agent, employee, servant, advisor, consultant, insurer and/or attorney of the Attorney General of Kentucky Office of Rate Intervention. The term “you” shall be deemed to refer to AG and the Company.

(e) The term “Commission” shall mean the Kentucky Public Service Commission.

(f) To “identify” shall mean:

(1) With respect to a document, to state its date, its author, its type (for example, letter, memorandum, chart, photograph, sound reproduction, etc.), its subject matter, its present location, and the name of its present custodian. The document may be produced in lieu of supplying the foregoing information. For each document which contains information as privileged or otherwise excludable from discovery, there shall be included a statement as to the basis for such claim of privilege or other grounds for exclusion.

(2) With regard to a natural person, to state his or her full name, last known employer or business affiliation, title and last known home address.

(3) With regard to a person other than a natural person, state the title of that person, any trade name, or corporate name or partnership name used by that person, and the principal business address of that person.

(g) To “produce” or to “identify and produce,” shall mean that Company shall produce each document or other requested tangible thing. For each tangible thing which Company contends is privileged or otherwise excludable from discovery, there shall be included a statement as to the basis for such claim of privilege or other grounds for exclusion.

(h) The terms “Party or Parties” shall mean any organization, person, corporation, entity, etc., which intervened in the above-captioned proceeding and shall further include the Commission Staff.

II. REQUESTS

1. Refer to the Direct Testimony of Greg R. Meyer (Meyer Direct Testimony). Provide a list of all proceedings in which Mr. Meyer has provided testimony before the Commission.

2. Refer to the Meyer Direct Testimony. Provide all workpapers, source documents, and electronic spreadsheets with all formulas, columns, and rows unprotected and accessible that were used in the development of Mr. Meyer’s recommendations and conclusions.

3. Refer to the Meyer Direct Testimony at 10-11.
a. Provide any examples of Mr. Meyer recommending the one-way right of way (“ROW”) tracker in any other electric cooperative proceeding in which he has testified.

b. If Mr. Meyer has recommended this tracker in any other proceeding, provide any examples of the one-way ROW expense tracker recommended that have been accepted by any regulatory commission.

c. Provide examples of a one-way ROW expense tracker utilized by other electric cooperatives in Kentucky.

4. Refer to the Application, Direct Testimony of Greg Grissom (Grissom Direct Testimony) at 5. Also refer to the Meyer Direct Testimony at 7-8. Explain the recommendation of reducing the ROW expense given Mr. Grissom's testimony that ROW budget had to be used elsewhere to maintain financial health of Jackson Purchase.

5. Refer to the Meyer Direct Testimony at 7. Explain why, "there is no reasonable basis to believe that JPEC is capable of meeting their target of ROW coverage for 358 miles per year" if Jackson Purchase receives the requested ROW increase.

6. Refer to Case No. 2023-00223, *Electronic Application of Fleming-Mason Energy Cooperative, Inc. for a General Adjustment of Rates*, June 6, 2024 Order page 15-16. Also refer to the Meyer Direct Testimony filed in this proceeding. In Case No. 2023-00223, the Commission did not accept Mr. Meyer's recommendation of a 1.50 times interest earned ratio ("TIER") and cited Commission precedent for a 2.0 TIER for electric cooperatives. Explain why Mr. Meyer again recommends a lower TIER than Commission precedent.