

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

THE ELECTRONIC APPLICATION OF BIG)	
SANDY RURAL ELECTRIC COOPERATIVE)	CASE NO.
CORPORATION FOR A GENERAL)	2024-00287
ADJUSTMENT OF RATES)	

**INITIAL DATA REQUESTS OF BIG SANDY RURAL ELECTRIC COOPERATIVE
CORPORATION TO THE KENTUCKY ATTORNEY GENERAL OFFICE OF RATE
INTERVENTION**

Filed: January 17, 2025

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 Big Sandy Rural Electric Cooperative Corporation ("Big Sandy").

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) Unless otherwise noted, the term “AG” shall mean The Kentucky Attorney General’s Office of Rate Intervention and shall include, but is not limited to, each and every employee, advisor, consultant and/or attorney of The Kentucky Attorney General’s Office of Rate Intervention. The term “you” shall be deemed to refer to the Kentucky Attorney General’s Office of Rate Intervention.
- (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.
8. The information requested herein shall be filed no later than January 31, 2025.

Respectfully submitted,

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Counsel for Big Sandy RECC

1. Refer to the Direct Testimony of Greg R. Meyer (Meyer Direct Testimony) at page 7, line 16. Please provide the replication of the year-end customer adjustment in electronic spreadsheet format with all formulas, calculations, links, and input data intact.
2. Refer to the Meyer Direct Testimony at page 21, line 18. Footnote 19 describes the derivation of the amount referenced. If a spreadsheet analysis or any other analysis beyond the text in the footnote was prepared, please provide it in electronic format with all formulas, calculations, links and input data intact.
3. Refer to the Meyer Direct Testimony. Provide any other workpapers used by Mr. Meyer to prepare his analysis and calculations. If such workpapers include spreadsheets, please provide in electronic format with all formulas, calculations, links and input data intact.
4. Refer to the Meyer Direct Testimony at page 25. Provide any orders of the Commission from 2014-2025 where the Commission authorized a Times Interest Earned Ratio (“TIER”) less than 2.0 for an electric cooperative.
5. Refer to the Meyer Direct Testimony at page 29. Provide any orders of the Commission from 2014-2025 where the Commission has required an electric cooperative to provide a reconciliation of spending for right-of-way (“ROW”) maintenance.