

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

In the Matter of:

THE ELECTRONIC APPLICATION OF	)	
FARMERS RURAL ELECTRIC	)	CASE NO.
COOPERATIVE CORPORATION FOR A	)	2025-00107
GENERAL ADJUSTMENT OF RATES	)	
AND OTHER GENERAL RELIEF	)	

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**ATTORNEY GENERAL’S SECOND REQUEST FOR INFORMATION TO  
FARMERS RURAL ELECTRIC COOPERATIVE CORPORATION**

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Comes now the Attorney General of the Commonwealth of Kentucky, by his Office of Rate Intervention (“Attorney General”), and submits these Data Requests to Farmers Rural Electric Cooperative Corporation (hereinafter “Farmers RECC” or “company”) to be answered by the date specified in the Commission’s May 13, 2025 Orders of Procedure in accord with the following:

- (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 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.

(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 undersigned Counsel 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.

Respectfully submitted,

RUSSELL COLEMAN  
ATTORNEY GENERAL



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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 July 3, 2025 an electronic copy of the foregoing was served via the Commission's electronic filing system.

this 3<sup>rd</sup> day of July, 2025.

A handwritten signature in blue ink, appearing to read "Thomas John" followed by a stylized flourish.

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Assistant Attorney General

**ATTORNEY GENERAL'S SECOND REQUEST FOR INFORMATION TO  
FARMERS RURAL ELECTRIC COOPERATIVE CORPORATION  
No. 2025-00107**

**Data Requests**

1. Please refer to Exhibit JW-2, Reference Schedule 1.06 and Farmers' Response to the Attorney General's Request 65:
  - a. Please confirm whether the customer counts in the annual reports can be reconciled through a calculation or combination of customer counts shown in Reference Schedule 1.06.
  - b. If confirmed, please provide the calculation of or combination of the customer counts that display how the annual reports and Reference Schedule 1.06 are related using Excel or an equivalent program.
2. Refer to Exhibit JW-2, Reference Schedule 1.10. Do any employees of Farmers RECC provide labor or services to Farmers Energy Propane Plus?
  - a. If so, please provide a detail breakdown of hours worked for the propane company for each employee (by PSC Ref Number) who provided labor for each year 2022 through 2024, and in each month of 2025 to date.
3. Refer to the response to PSC Staff data request number 1-38. Please provide the Cost Allocation Manual.
4. Refer to the response to PSC Staff data request number 1-38. Please provide the organizational chart of Farmers Energy Propane Plus and a list of all executives and directors.
5. Refer to the response to PSC Staff data request number 1-38. Does Farmers RECC incur any costs beyond labor on behalf of Farmers Energy Propane Plus?

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No. 2025-00107**

- a. Please provide a breakdown of all non-labor charges incurred by Farmers RECC on behalf of Farmers Energy Propane Plus in each of the years 2022 through 2024, and in each month of 2025 to date.
6. Please detail any reimbursement received by Farmers RECC from Farmers Energy Propane Plus in each year 2022 through 2024, and in each month of 2025 to date.
7. Please refer to Exhibit JW-2, Reference Schedule 1.17 and the responses to AG data request 1-68. Please explain how the purchase of the Outerloop property was financed. Were any interest charges or depreciation expense related to the Outerloop property ever included in member rates? Was the property ever used in providing service to members.
8. Please refer to Exhibit JW-2, Reference Schedule 1.10. Please provide a breakdown of overtime costs for each year 2022 to 2024, and for each month of 2025 to date.
9. Have there been any significant changes to Farmers RECC's operations in the 2022 to 2024 timeframe that would impact the labor required from Farmers' employees?