Grayson Rural Electric Cooperative Corporation

109 Bagby Park • Grayson, KY 41143-1292 Telephone 606-474-5136 • 1-800-562-3532 • Fax 606-474-5862

RECEIVED

JAN 07 2009

PUBLIC SERVICE COMMISSION

January 6, 2009

Paul D. Adams
Office of the Attorney General Utility and Rate
1024 Capital Center Drive, Suite 200
Frankfort, Kentucky 40601

Re: PSC Case No. 2008-00254 Grayson Rural Electric Cooperative

Dear Mr. Adams:

Please find in Case No. 2008-00254 the original and seven (7) copies of Applicant's response to "First Data Request of the Attorney General to Grayson Rural Electric Cooperative, Inc". This relates to the application for adjustment of rates by Grayson Rural Electric Cooperative Corporation.

Contact me at (606) 474-5194 or Don Combs at (606) 474-5136 if there are any questions

Thanks for your assistance in this matter

Yours truly,

W. Jeffrey Scott Counsel for Grayson Rural Electric Cooperative Corporation

Enclosures

COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF GRAYSON RURAL ELECTRIC COOPERATIVE CORPORATION FOR AN ADJUSTMENT IN RATES AND AN INCREASE IN RETAIL ELECTRIC RATES EQUAL TO INCREASE IN WHOLESALE POWER COSTS

Case No. 2008-00254

APPLICANT'S RESPONSES TO FIRST DATA REQUEST OF ATTORNEY GENERAL

The applicant, Grayson Rural Electric Cooperative Corporation makes the following responses to the "First Data Request of Attorney General", as follows:

- 4. The witnesses who are prepared to answer questions concerning each request are Carol H. Fraley, Don Combs, Alan Zumstein, and Jim Adkins.
- 5 Don Combs, Manager of Finance and Accounting of Grayson Rural Electric Cooperative Corporation is the person supervising the preparation of the responses on behalf of the applicant.

6. The responses and Exhibits are attached hereto and incorporated by reference herein.

W JEFFREY SCOTT, ATTORNEY AT

LAW

P.O. Box 608

Grayson, Kentucky 41143

Attorney for Grayson Rural Electric Cooperative Corporation

Telephone: 606-474-5194

The undersigned, Don Combs, as Manager of Finance and Accounting of Grayson Rural Electric Cooperative Corporation, being first duly sworn, states that the responses herein are true and accurate to the best of my knowledge and belief formed after reasonable inquiry.

Dated: January 6, 2009

GRAYSON RURAL ELECTRIC COOPERATIVE

Ву._____

DON COMBS

MANAGER OF FINANCE AND ACCOUNTING

Subscribed, sworn to, and acknowledged before me by Don Combs, as Manager Finance and Accounting of Corporate Services for Grayson Rural Electric Cooperative Corporation on behalf of said Corporation this 6th day of January, 2009.

Notary Public, Kentucky State At Large

My Commission Expires. 1-9-2011

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CERTIFICATE OF SERVICE

The undersigned counsel certifies that the foregoing responses have been served upon the following.

Original and Seven Copies

Ms. Stephanie Stumbo, Executive Director Kentucky Public Service Commission 211 Sower Boulevard Frankfort, Kentucky 40601

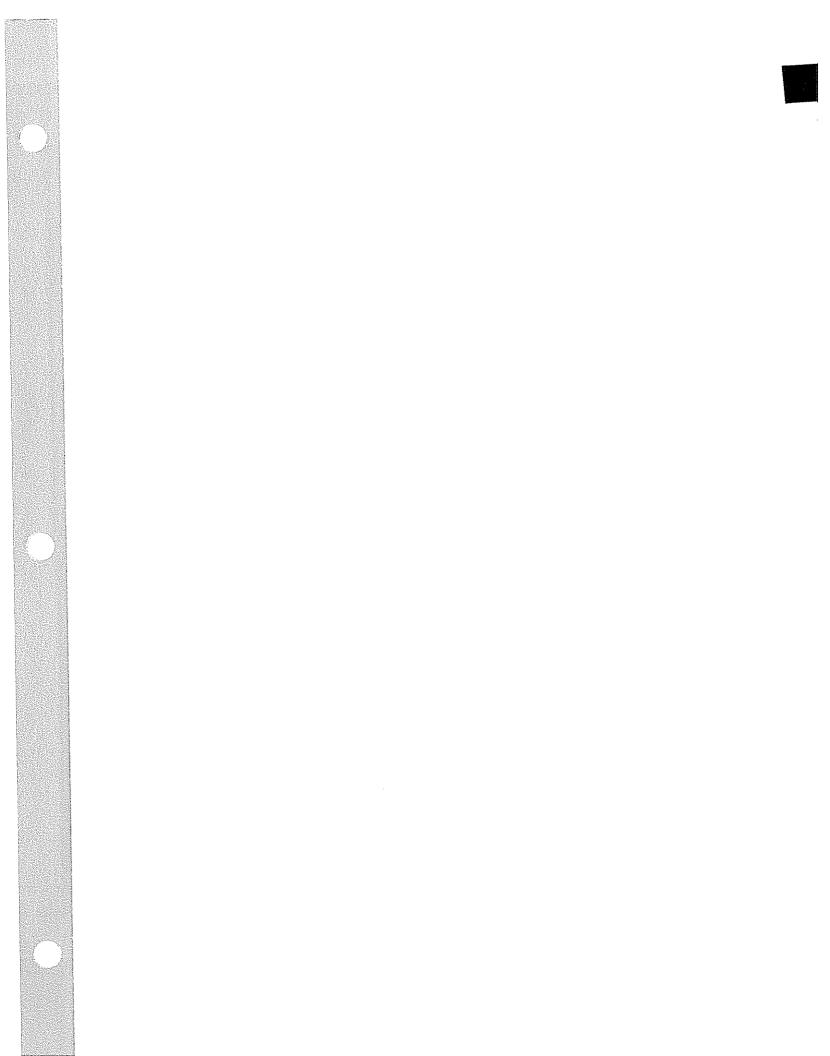
Copy

Paul D. Adams Office of the Attorney General Utility and Rate 1024 Capital Center Drive, Suite 200 Frankfort, Kentucky 40601

This 6th day of January, 2009

ATTORNEY FOIL GRAYSON RURAL

ELECTRIC COOPERATIVECORPORATION



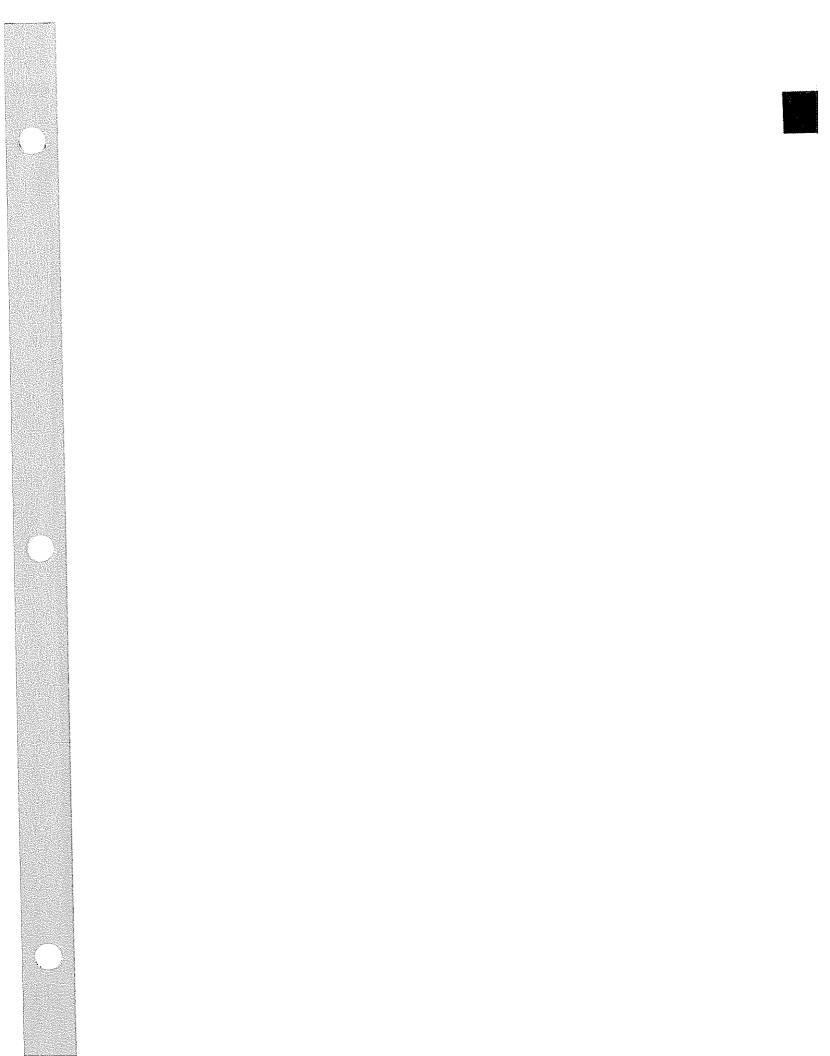
Initial Requests For Information of the Attorney General

Question 1
Page 1 of 1
Witness: Alan Zumstein

Please provide the portion of the 13-month average prepayment balance of \$596,352 (Exhibit K, page 2 of 7) that represents the 13-month average test year PSC assessment prepayments.

Response:

May,	
2007	31,744
June	27,210
July	22,676
August	18,142
September	13,608
October	9,074
November	4,540
December	0
January, 2008	50,396
February	45,815
March	32,072
April	36,653
May	32,072

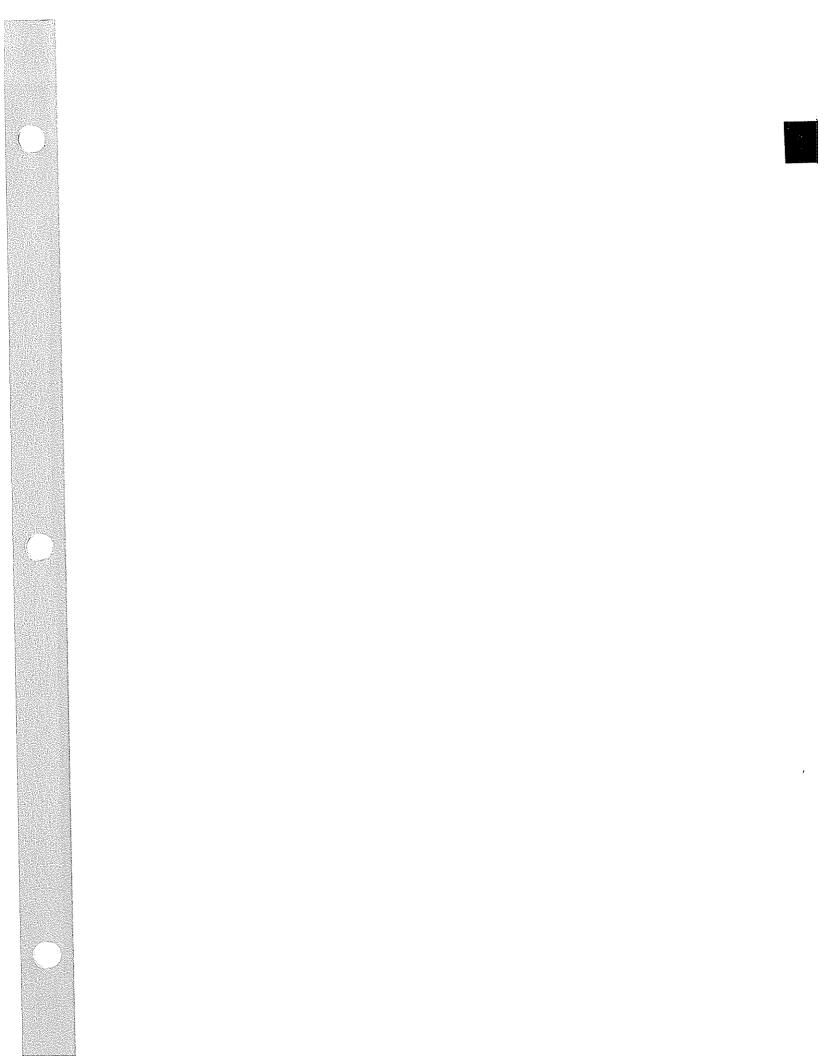


Initial Requests For Information of the Attorney General

Question 2 Page 1 of 1 Witness: Alan Zumstein

2. Re. Exhibit S, page 1. Why hasn't Grayson added the proposed \$426,201 depreciation expense increase to its pro forma deprecation reserve as is the Commission's ratemaking policy?

Response: An oversight only.

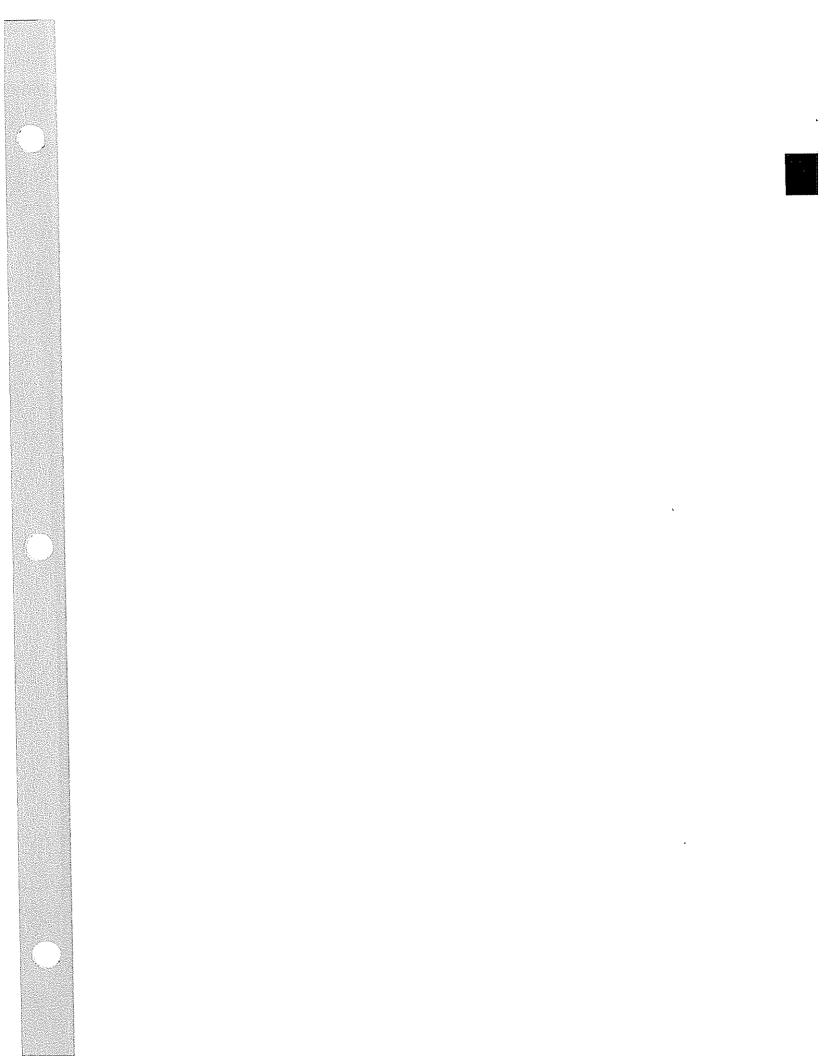


Initial Requests For Information of the Attorney General

Question 3
Page 1 of 1
Witness: Alan Zumstein

Re Exhibit S, page 2: should the proposed increase amount be \$3,161,625 rather than \$3,161,265 and the proposed test year revenues \$25,155,018 rather than \$25,154,657? If not, explain the discrepancy with the numbers on Exhibit G, page 1.

Response: The revenue requirement reflected in Schedule S, page 2 of the Application in the amount of \$3,161,265 is correct. This is a transposition of numbers only.



Initial Requests For Information of the Attorney General

Question 4
Page 1 of 4
Witness: Alan Zumstein

4. For each of the income statement accounts listed on Exhibit X, pages 1 through 5, please provide a schedule showing a side-by-side comparison of the actual annual amounts (only annual amounts are requested, not monthly amounts) for the 5/31/08 test year and the three years prior to the test year.

Response: Attached.

Grayson Rural Electric Cooperative Case No. 2008-00254 Exhibit W

Question 4 Page 2 of 4 Witness: Alan Zumstein

AG Initial Request for Information, Question 4

Davidana	
Revenues 440.10 Residential Rural 14,045,281 16,196,151 16,995,031 440.40 Camp and barns 275,938 329,365 359,320	399,902
442.10 Small commercial 1,348,655 1,535,517 1,615,342 442.20 Large power 2,714,456 3,214,275 3,372,711	
442.30 Large industrial 870,236 975,090 923,660	
444 00 Street lighting 7,963 8,965 9,347	·
19,262,530 22,259,363 23,275,410	24,329,471
450.00 Forfeit discounts 327,130 372,841 405,591	412,774
454.00 Rent 291,927 293,321 300,518	
456.00 Other Electric Rev 75,187 75,946 74,561	73,958
	25,118,850
Purchased Power	46 DED 707
555 Purchased Power 12,223,987 15,155,360 15,963,936	6 16,950,727
Distribution - Operations	7 400 004
583 O/H Line 400,471 395,000 438,657	
585 Security Lights 226 518 406 586 Meter 382,543 431,061 437,046	
586 Meter 382,543 431,061 437,046 588 Misc Dist Eqt 53,941 51,565 49,691	
837,181 878,144 925,800	1,061,215
2007,101 070,174 320,000	
Distribution - Maintenance	
590 Supervision 202,707 165,599 173,748	·
593 O/H Lines 751,181 666,728 684,072	· · · · · · · · · · · · · · · · · · ·
593.10 R-O-W clearing 780,628 761,934 752,983	
593.20 Storm damage 0 0 (94,07)	,
594 U/G Line 2,646 1,513 1,768 595 Transformers 23,125 16,854 14,048	-
596 Public street lights 12,153 14,568 13,410	
597 Meters 33,275 161 247	
598 Misc Distr Plant 58,263 54,616 41,899	
1,863,978 1,681,973 1,588,104	4 2,478,718
Consumer Accounts	74. III. III. III. III. III. III. III. I
901 Supervision 46,430 60,535 61,193	64,082
902 Meter Read Exp 1,845 2,142 1,282	2 1,223
903 Consumer Collection 696,369 694,578 693,290	725,894
# · · · · - · · · · · · · · · · · ·	7 221
904 Uncollectible A/c 44,234 66,263 71,870	84,253
	1 875,674

Grayson Rural Electric Cooperative Case No. 2008-00254 Exhibit W

Question 4 Page 3 of 4 Witness: Alan Zumstein

AG Initial Request for Information, Question 4

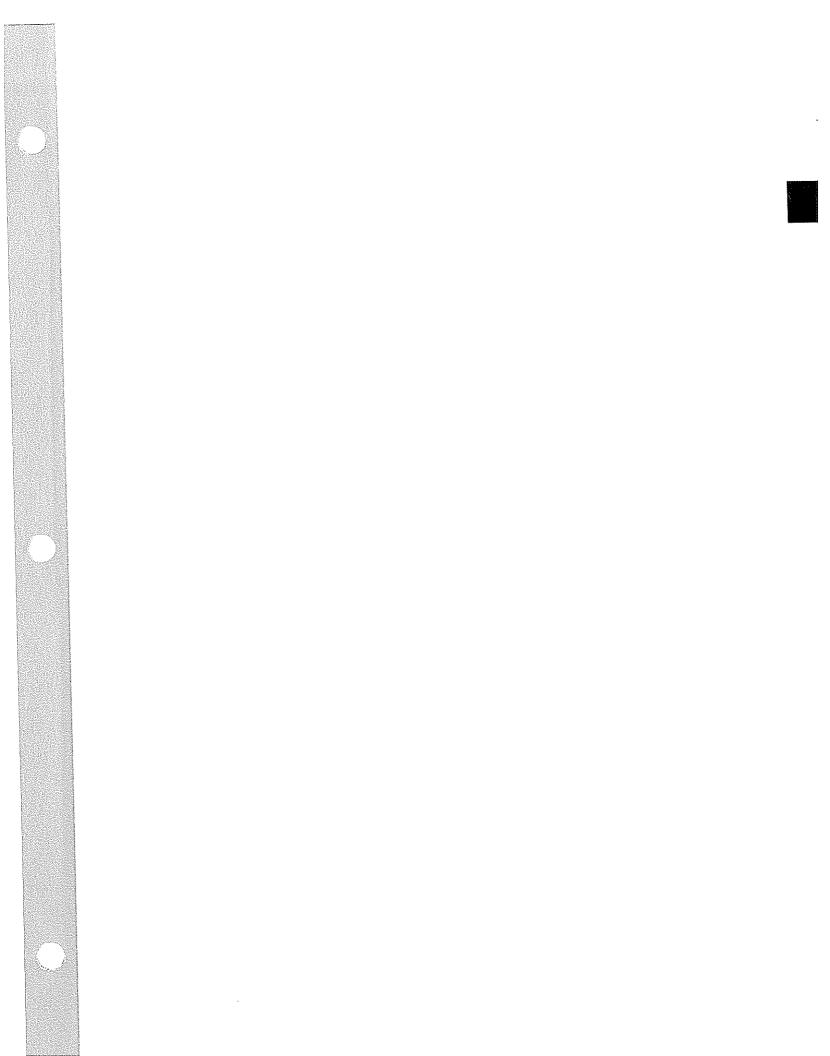
Account	<u>Description</u>	12 Mos <u>05/31-05</u>	12 Mos <u>05/31-06</u>	12 Mos <u>05/31-07</u>	12 Mos <u>05/31-08</u>
Customa	er Service				
909	Information	120,237	150,466	170,232	•
		120,237	150,466	170,232	194,688
Sales					
912	Demonstration and Se	25,523	25,686	29,522	29,838
913	Advertising	6,286	5,295	5,760	4,606
		31,808	30,981	35,283	
Adminis	trative & General				
920	Office Salaries	629,942	675,557	703,358	706,020
921	Office Supplies	85,938	79,020	124,789	89,334
923	Outside Services	43,096	46,122	69,420	58,464
930.20	Annual meeting	35,709	32,270	27,555	27,421
930.30	Miscellaneous expens	34,407	31,654	31,829	37,888
930.60	Directors Expene	153,885	143,561	129,589	139,406
930.70	Dues in Assoc Organ	46,570	49,623	54,323	54,649
932	Misc General Plant	120,264	126,224	145,491	196,044
		1,149,811	1,184,032	1,286,353	1,309,225
Depreci	ation	وي	ware one took this was support our over the sale sale.	شند شند بنو بنو بنها ۱۹۰۰ کند شده شد پنو بنو بنو داند کند.	نند فقد بالا ۱۳۳۰ الله شعد عبد _{الحج} بها ۱۳۳۰ الله الله عند
403.6	Distribution Plant	1,287,189	1,345,709	1,406,628	1,471,175
403.7		79,708	83,147	85,197	88,334
		1,366,897	1,428,856	1,491,824	1,559,510
		ينية المقد المدر فيور بين ويدر المدر	على خوار الله الله الله الله الله الله الله ال	All the last was just bey him the last was any over over	بيس فيمث الله الله وي يبير ليس سنة الله الله الله الله الله الله الله الل
Taxes 408.6	PSC	21,868	22,536	26,339	26,326
		21,868	22,536	26,339	26,326
Interest		and part was seen up the same and a sur-sure way that and	چېدا شامل کان کان کې پېټې پېټې چېد چېد چېد کان کان کې پېټې پېټې پېټې	444 day till til 120 mm 444 day till till till 140 mm	न्यून रुक्त प्रति <u>१६६६ १६६६ इस्त</u> प्रकृत हैना सेता सेती स्थान ग्रून रुक्त
427.1	RUS	762,114	809,774	813,853	950,985
427.2	CFC	136,465	123,869	125,032	117,056
427.60	FFB	194,274	402,608	539,819	378,858
		1,092,853	1,336,250	1,478,703	1,446,899
O+b !	toroot	ينهم بيناه الله الله الله الله الله الله الله ا	يبير چونرنين څخه خطر خپير يون يون نين شره باو پير	17g juga dala 1880 'NO' 'NO' 'yaya apad 1880 'NO' 'NO'	244 APT THE GLA COM THE THE THE THE WAY THE
Other in		440 420	&E 200	1/10/7	0E 20E
430.00	Int to Assoc Organ	148,130 61 307	65,388 63,416	141,847 67,761	95,285 70,943
431.00	Other Interest Exp	61,397	00,410	07,701	10,343
		209,527	128,803	209,609	166,228

Grayson Rural Electric Cooperative Case No. 2008-00254 Exhibit W

Question 4 Page 4 of 4 Witness: Alan Zumstein

AG Initial Request for Information, Question 4

Account	Description	12 Mos <u>05/31-05</u>	12 Mos <u>05/31-06</u>	12 Mos <u>05/31-07</u>	12 Mos <u>05/31-08</u>
Other In	come Revenue from Mercha	(3,152)	(7,543)	(8,809)	(2,888)
415.10 414.4	Elliott Co garbage coll Rental income	(12,810)	•		
416	Incentives, heat pump	5,357	12,133	16,597	• • •
416.10	Expenses from Home	1,267	(754)	79	0
416.20	Elliott Co garbage exp	6,251	6,847	6,721	6,679
416.30	ETS	941	1,058	2,453	•
417	Expenses from KTI	0	1,831	220	
421	Gain loss on disposition	4,211	2,114	9,272	11,279
		2,065	4,515	13,688	12,185
Other D	eductions				
426.1	Donations	9,083	8,474	15,954	12,800
Non Op	erating Margins				
419	Interest Income	(32,062)	(31,562)	(30,552)	(34,810)
Patrona	ge Capital	and that may gave who over who for more each year and the			
423	• .	0	0	0	0
424	Other assoc organ	(37,046)	(43,899)	(42,287)	(65,590)
		(37,046)	(43,899)	(42,287)	(65,590)
Net Mar	gins (loss)	307,902	242,950	95,364	(909,390)



Initial Requests For Information of the Attorney General

Question 5 Page 1 of 1 Witness: Alan Zumstein

5. Please expand the year-end customer annualization adjustment on Exhibit 15 by also including Schedule 5 (Street Lighting), and Schedule 6 (Security Lights) in the net revenue annualization calculations. Provide this information in the same detail and format as shown on Exhibit 15.

Response: Attached

Grayson Rural Electric Cooperative Case No. 2008-00254 End of Test Year Customer Adjustment

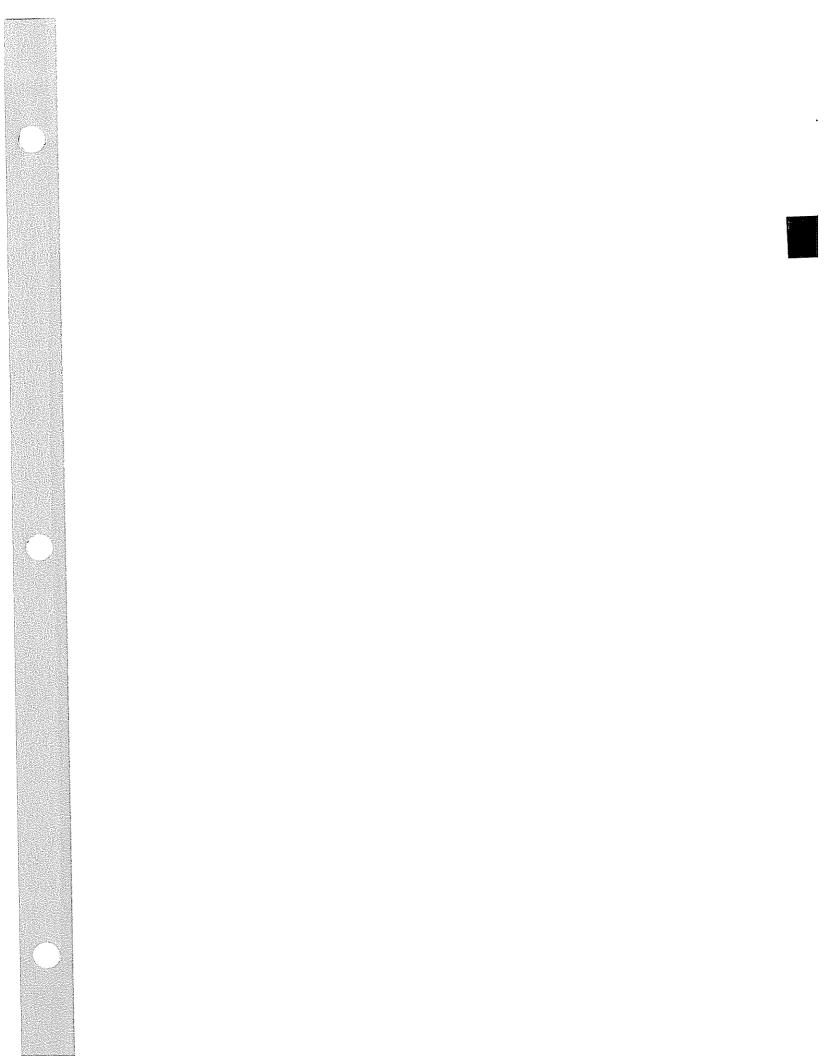
2

Kwh purchased
Cost per kwh purchased

59 60 61

7									
8		Sch i	Sch 2	Sch 3	Sch 4	Sch 7	Sch 13A	Sch 5	Sch 6
9		Farm &	Small	Off-Peak	Large	All Electric	Large Ind	Street	Security
10		<u>Home</u>	Commercial	Marketing	Power	<u>Schools</u>	<u>Service</u>	<u>Lights</u>	<u>Lights</u>
11						_		444	2.000
12	May, 2007	14,253	1,166	97	60	8	1	111	3,998
13	June	14,256	1,166	97	60	8	1	111	4,003
14	July	14,252	1,166	97	60	8	1	110	4,012
15	August	14,286	1,168	96	60	8	1	110	4,051
16	September	14,284	1,163	95	60	8	1	110	4,048
17	October	14,240	1,158	94	61	8	1	110	4,048
18	November	14,295	1,161	95	61	8	1	110	4,063
19	December	14,199	1,158	100	62	8	1	110	4,056
20	January, 2008	14,334	1,171	100	61	8	1	110	4,105
21	February	14,288	1,165	104	61	8	1	110 110	4,082 4,074
22	March	14,241	1,166	101	61	8	1	105	,
23	April	14,273	1,160	104	61	8	1	105	4,103 4,105
24	May	14,233	1,174	100	61	8	1	104	4,100
25						•		400	4 050
26	Average	14,264	1,165	98	61	8	1	109	4,058
27				_	_		0	(E)	47
28	Increase	(31)	9	2	0	0	U	(5)	41
29						200 (27	000 004	10,178	387,437
30	Test year base revenue	15,871,896	1,423,973	144,702	2,639,113	399,497	803,031		•
31	kwh useage	186,688,210	16,913,798	1,991,027	34,588,171	5,836,500	15,009,600	98,250	3,849,402
32						00 000 45	00 05050	en 40250	en 400es
33	Average per kwh	\$0.08502	\$0.08419	\$0.07268	\$0.07630	\$0.06845	\$0.05350	\$0.10359	\$0.10065
34								4.045	40.755
35	Tolal billings	171,181	13,976	1,183	729	96	12	1,310	48,750
36						40 707	4 050 000	75	79
37	Average monthly kwh use	1,091	1,210	1,683	47,446	60,797	1,250,800	75	79
38									
39	Increase in consumers, times aver								
40	times average rate, times 12 mo	nths,							
41	equals additional revenues								
42					•	o	0	(466)	4,482
43	Increase in revenues	(34,492)	11,004	2,936	0	Ų	U	(400)	4,402
44									
45	Increase in consumers, times aver								
46	times average cost per kwh purc	chased,							
47	times 12 months,								
48	equals additional power cost								
49					_	_		(000)	0.000
50	Increase in power cost	(20,615)	6,641	2,052	0	0	0	(229)	2,263
51						_	_	(4444)	0.040
52	Net increase	(13,877)	4,363	883	0	0	0	(238)	2,219
53									
54	Adjustment	(6,650)							
55									
56									
57	Base power cost			14,298,913					
	Mark and and an and			281 <i>A</i> 05 820					

281,405,820 \$0.05081



Initial Requests For Information of the Attorney General

Question 6 Page 1 of 1 Witness: Alan Zumstein

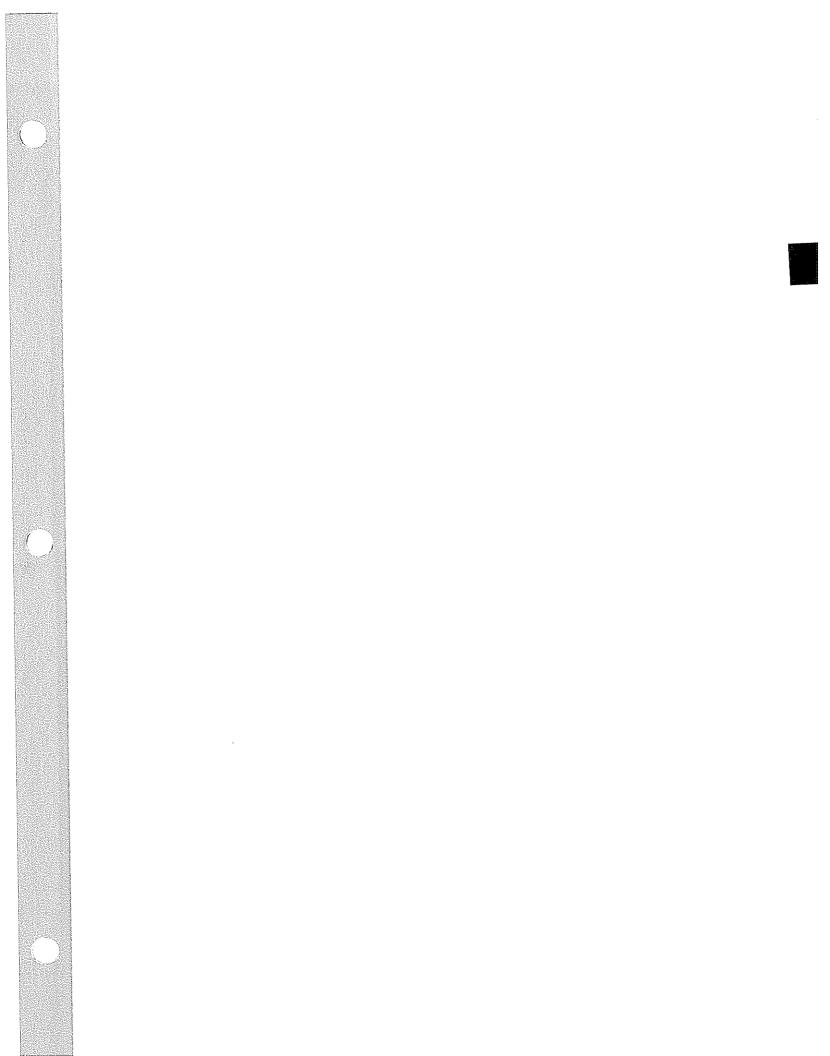
- 6. With regard to the Schedule 4 Large Power end-of-year customer adjustment on Exhibit 15, please provide the following information:
 - a Confirm that the 13-month average customers for the year for the year amount to 60.69 which, when compared to the year-end customer level of 61 indicates a growth of 0.31 customers.

Response: Grayson does not bill for partial customers, either a customer is in a particular rate class, or they are not billed. That is why the Average number of customers is rounded to whole numbers and not rounded to partial customers.

Grayson does not agree as there are only complete customers billed.

b. Confirm that this growth number of 0.31 large power customers results in an increase in revenues of \$13,467, an increase in associated power costs of \$8,968, and a net revenue increase of \$4,499.

Response: No



Item # 7
Page 1 of 1
Witness: Don Combs

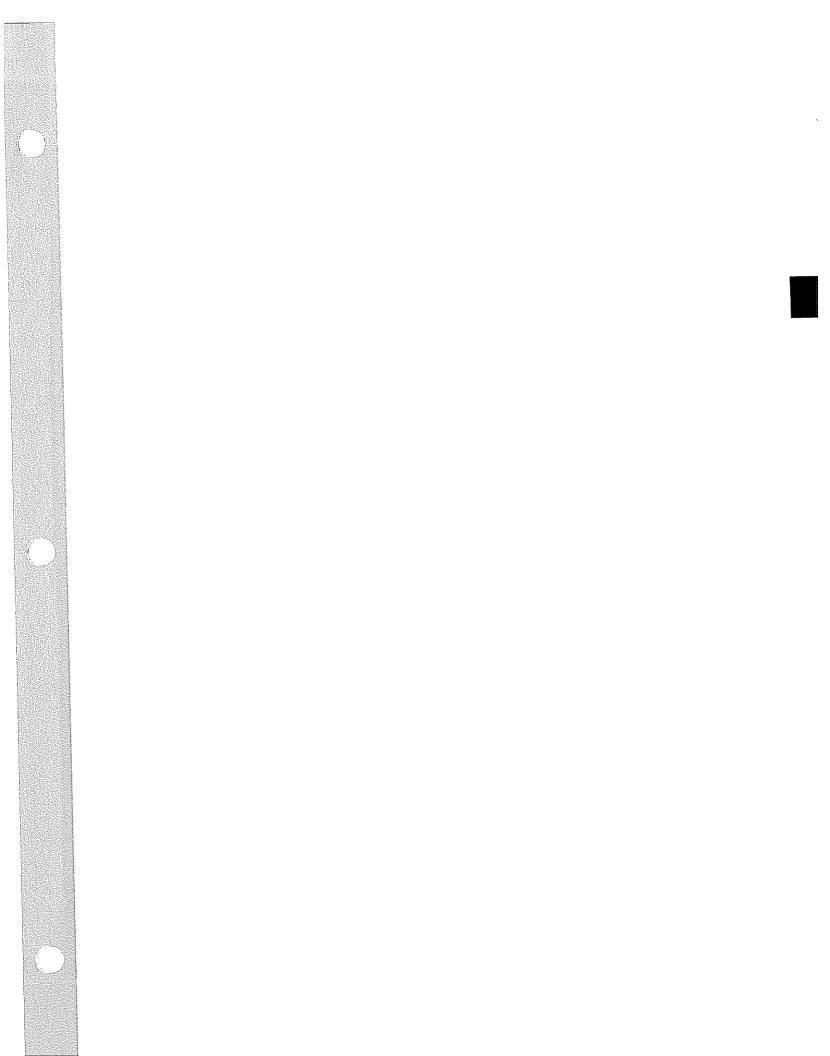
Grayson Rural Electric Case No. 2008-00254

1st Data Request of the Attorney General

7. The first column of Exhibit 13, page 3 of 6 shows the number of events assumed in the quantification of the Non-Recurring Charge revenue adjustment. For each non-recurring charge listed, please provide the actual annual number of events in the test year and in the three years prior to the test year.

Response:

	Test Year	1st prior year	2nd prior year	3rd prior year
Return Check	499	454	487	417
Meter Reading	0	0	1	0
Collection	1543	1510	1540	1627
Installation / Reconnect	729	800	795	786
Meter Tests	2	0	0	0
Exceptional Circumstances				
Overtime	102	165	181	166



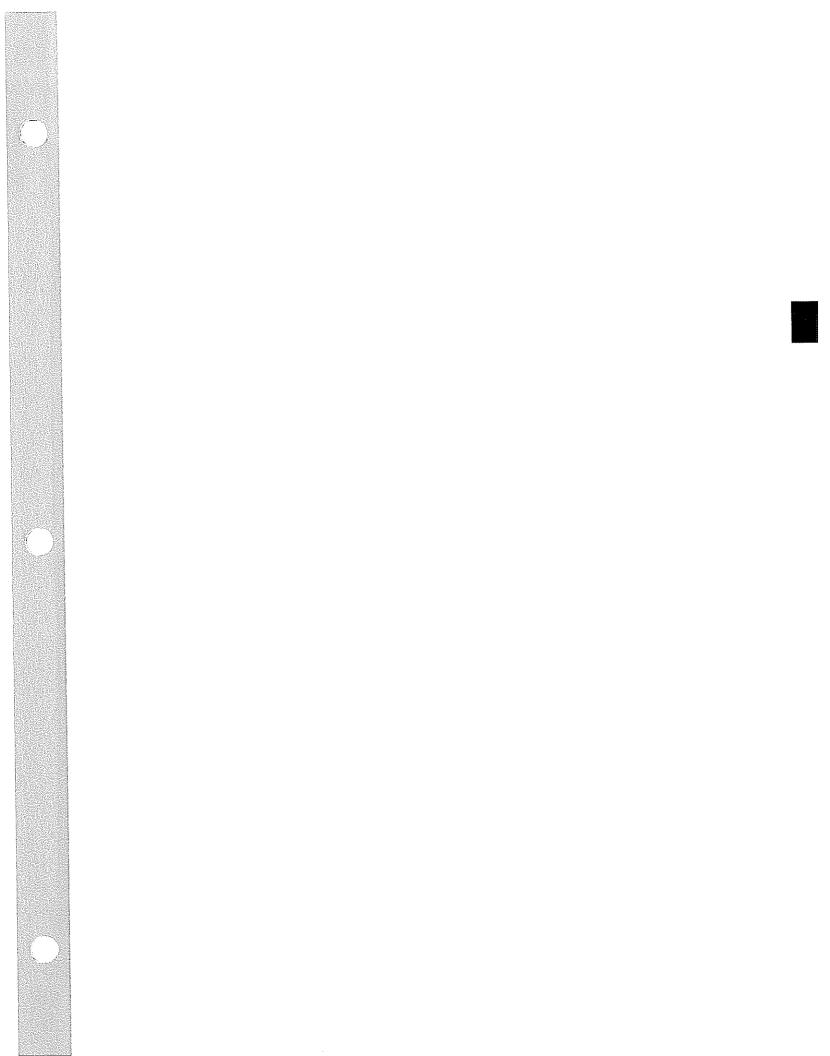
Item 8
Page 1 of 1
Witness: Don Combs

Grayson Rural Electric Case NO. 2008-00254 1st Data Request of the Attorney General

8. Please provide the approximate 65% increase in the test year combined Account 593 and 593.10 expenses of \$2.206 million as compared to the corresponding combined Account 593 and 593.10 expenses of \$1.340 million in the year prior to the test year.

Response:

The increase was due to added Right of Way Clearing expense, as a direct result of PSC Case No. 2006-00494, that emphasized and resulted in a plan to cover Grayson's entire system every 7 years. Also, included in the \$1.340 million total in the year prior to the test year was a \$94,000 reimbursement from FEMA for expenses incurred in 2003



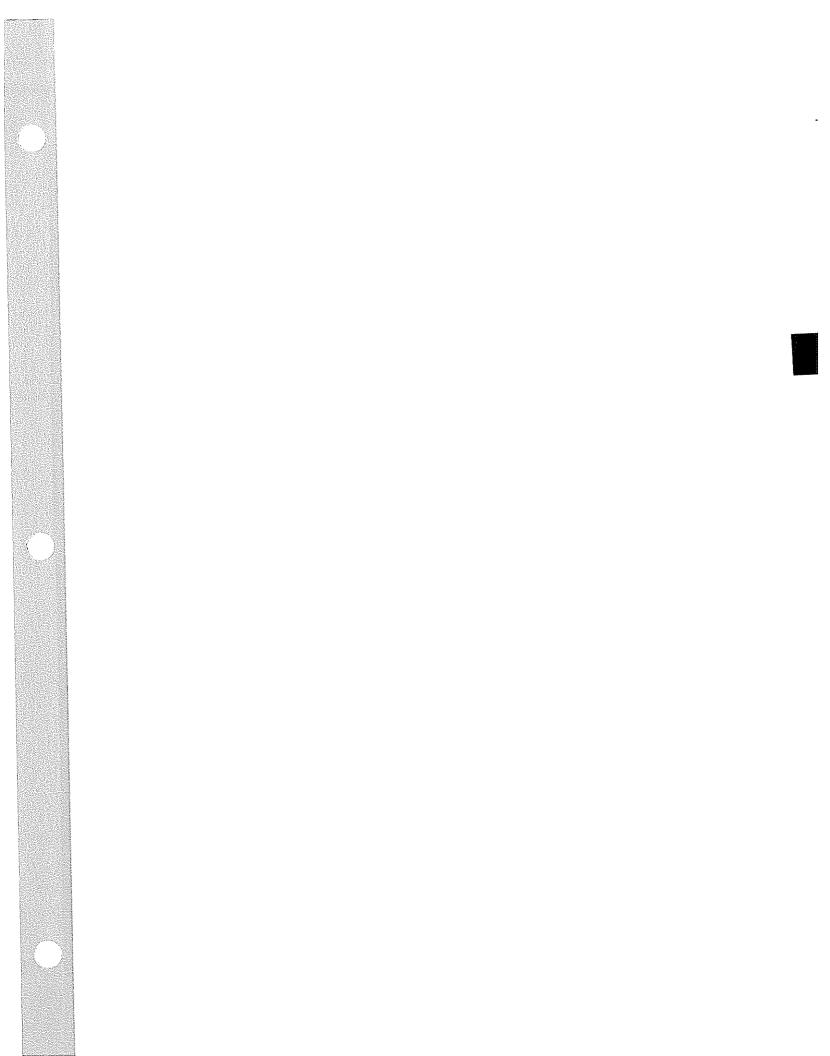
Initial Requests For Information of the Attorney General

Question 9
Page 1 of 1
Witness: Alan Zumstein

9. With regard to Account 909.00 – Customer Information expense, please provide a detailed breakout of the nature and purpose of the expense components making up the total test year expense amount of \$194,688.

Response: The detail breakout of Account 909 is as follows:

Labor and benefits	110,091
Transportation	12,048
KY Living magazine	67,405
Telephone	1,718
Meetings and meals	5,266
Advertising	7,552
Miscellaneous	157
EKPC Partner Plus reimbursement	(9,549)
	194,688



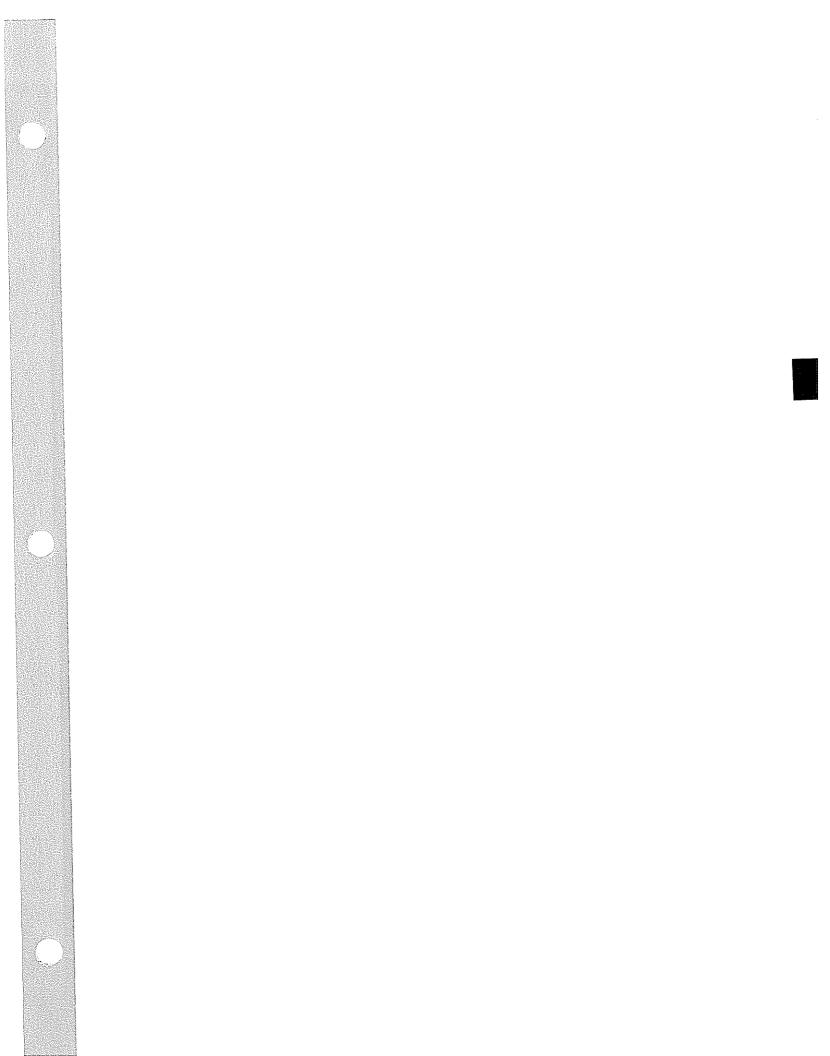
Initial Requests For Information of the Attorney General

Question 10 Page 1 of 1 Witness: Alan Zumstein

10. With regard to Account 912.00 - Demonstration & Selling expense, please provide a detailed breakout of the nature and purpose of the expense components making up the total test year expense amount of \$29,838.

Response: The detail breakout of Account 912 is as follows:

Labor and benefits	28,340
Utilities	1,498
	29,838

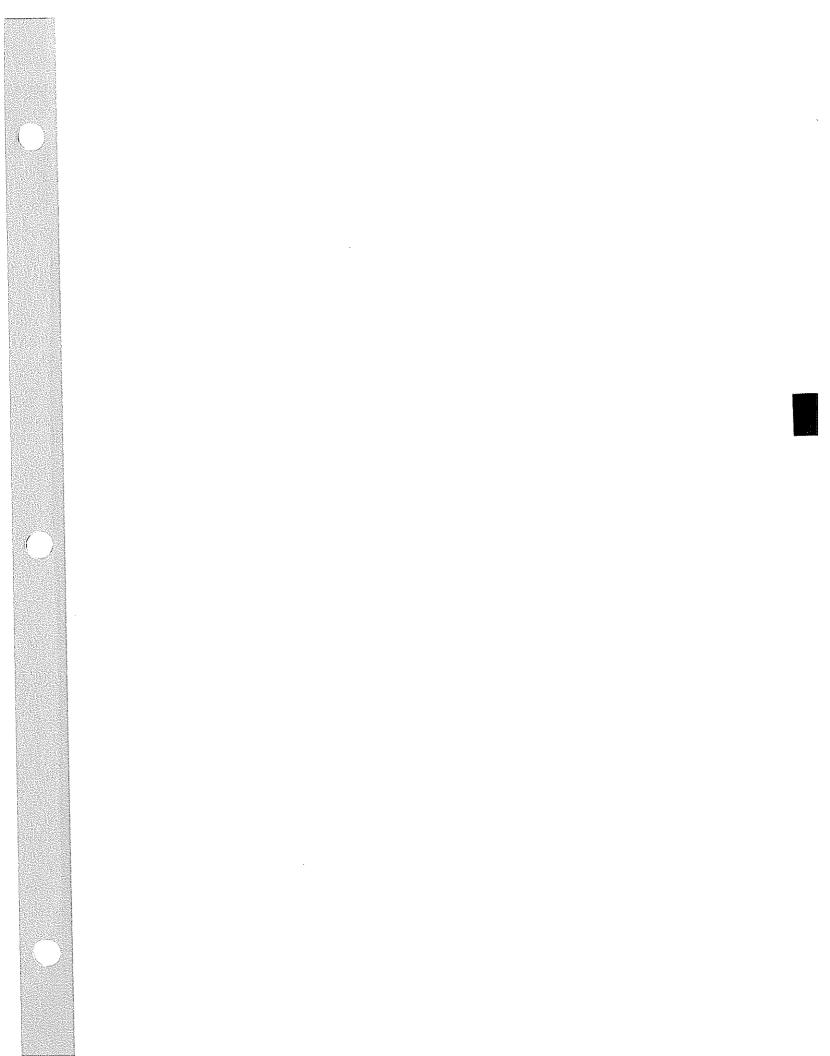


Initial Requests For Information of the Attorney General

Question 11 Page 1 of 1 Witness: Alan Zumstein

With regard to the Payroll information shown on Exhibit 1, please explain why Grayson has assumed normalized annual hours of 2,080 for the following employees who worked substantially less than 2,080 hours during the test year: hourly employee no 217 and hourly employee number 231.

Response: See PSC 2-9.a.



Item # 12 Page 1 of 1 Witness: Don Combs

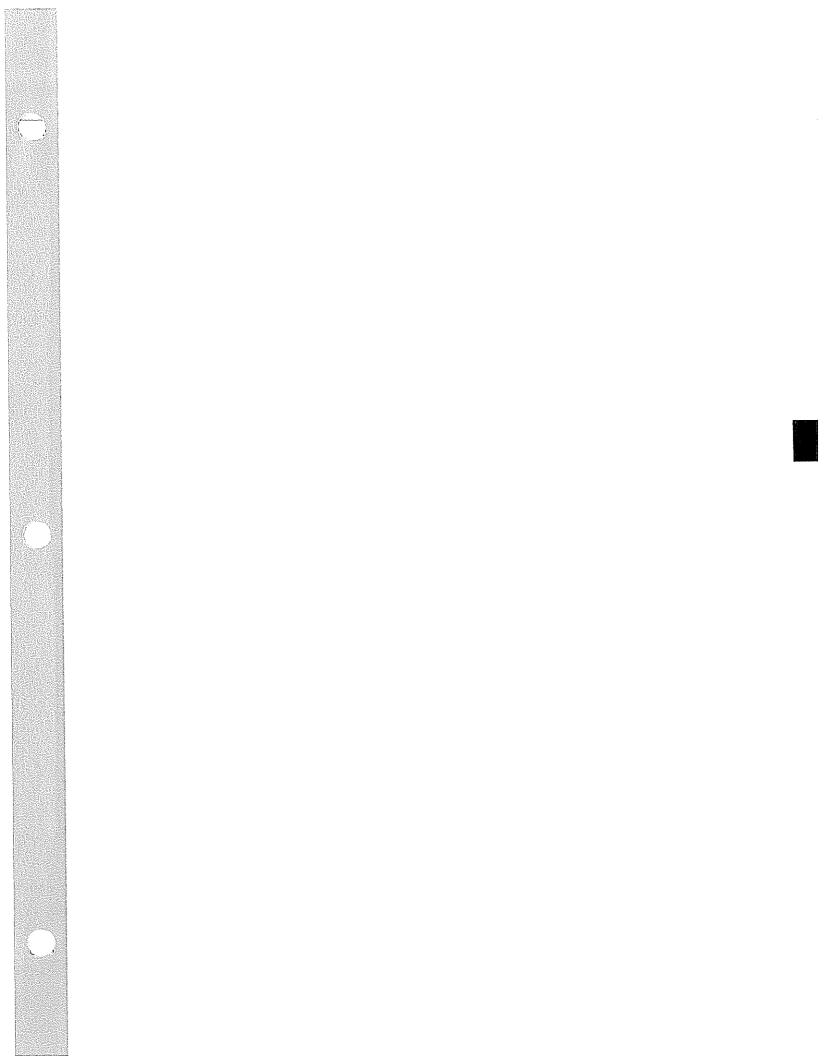
Grayson Rural Electric Case No. 2008-00254

1st Data Request of the Attorney General

With regard to Grayson's number of employees, please provide the number of employees (in total and broken out between salaried, hourly, summer and part-time) for each month from January 2007 through November 2008, as compared to the corresponding employees used in calculating the adjusted test year payroll expense.

Response:

		<u>Salary</u>	<u>Hourly</u>	<u>Summer / Part-time</u>	<u>Total</u>
Jan-07	(Number of Employees)	10	33	4	47
Feb-07	•	10	34	2	46
Маг-07		10	34	2	46
Apr-07		10	34	2	46
May-07		10	34	4	48
Jun-07		10	34	4	48
Jul-07		10	34	5	49
Aug-07		10	34	5	49
Sep-07		10	34	1	45
Oct-07		10	34	1	45
Nov-07		10	34	1	45
Dec-07		10	34	2	46
Jan-08		10	34	3	47
Feb-08		10	35	4	49
Mar-08		10	35	4	49
Apr-08		10	35	4	49
May-08		10	35	4	49
Jun-08		10	35	3	48
Jul-08		10	35	3	48
Aug-08		10	35	3	48
Sep-08		10	35	3	48
Oct-08		10	35	2	47
Nov-08		10	35	2	47



Item # 13 Page 1 of 1 Witness: Don Combs

Grayson Rural Electric Case No. 2008-00254

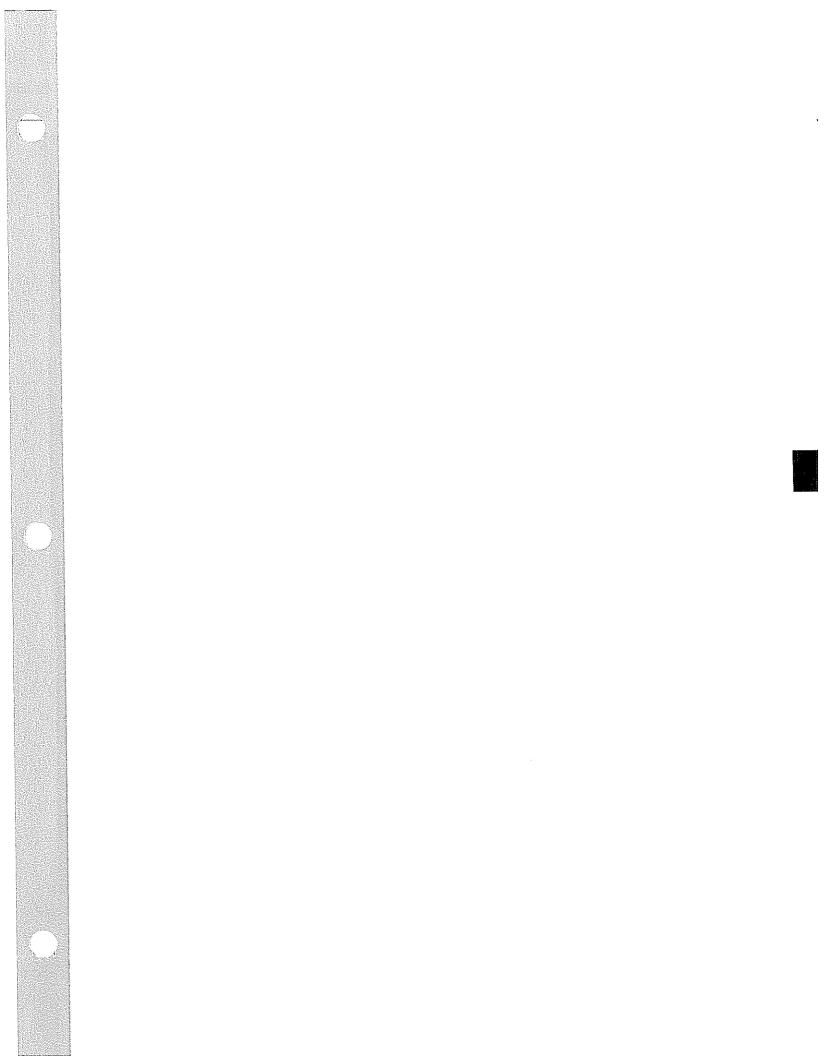
1st Data Request of the Attorney General

Please provide the actual number of hours worked by Grayson's Summer and Part Time employees (in total and, if available, by employee number) in the three years prior to the test year.

Response:

Hours worked by Summer & Part-time Employees

Employee (#)	(Prior to	test year) 2007	2006	<u>2005</u>
	246	520	-	320
	627	62	1104	1194
	629	496	401	377
	631	312	437	634
	635	1089	505	-
	636	388	_	-
			609	983
	242	_	4	230
	247	-	350	310
	633	-	330	68
	243	-	•	237
	245	-		
		2,867	<u>3,410</u>	4,353



Item # 14 Page 1 of 1

Witness: Don Combs

Grayson Rural Electric Case No. 2008-00254

1st Data Request of the Attorney General

- Exhibit 1, page 4 shows total test year overtime hours of 4,086 with an associated overtime expense amount of \$149,996. In this regard, please provide the following information:
- a. The actual overtime hours and associated overtime expenses booked by Grayson during the three years prior to the test year.

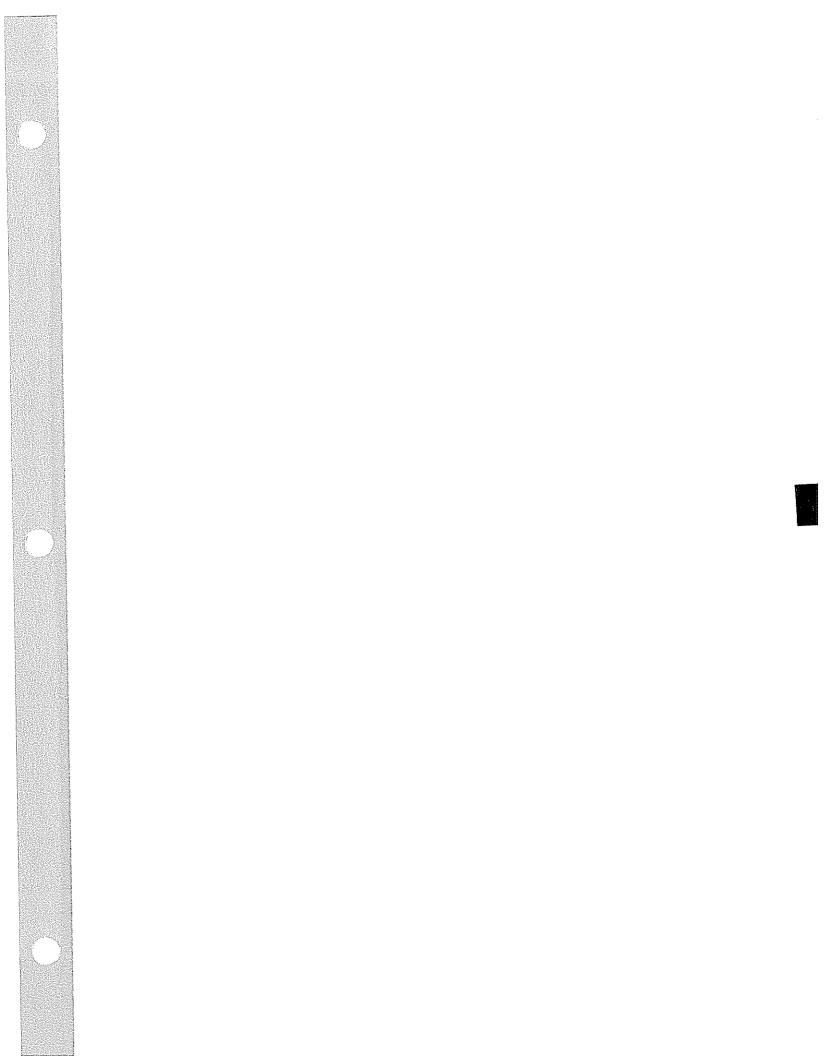
Response:

See Exhibit 1, page 8 of 8 of the application

b. What are the number of overtime hours underlying the pro forma test year overtime expenses of \$155,439?

Response:

<u>Test Year</u>
\$ 4,098 155,439
\$



Item # 15
Page 1 of 1
Witness: Don Combs

Grayson Rural Electric Case No. 2008-00254

1st Data Request of the Attorney General

- Exhibit 1, page 4 shows total test year Vac/Sick hours of 565 with an associated expense amount of \$11,070. In this regard, please provide the following information:
- a. The actual Vac/Sick hours and associated expenses booked by Grayson during the three years prior to the test year.

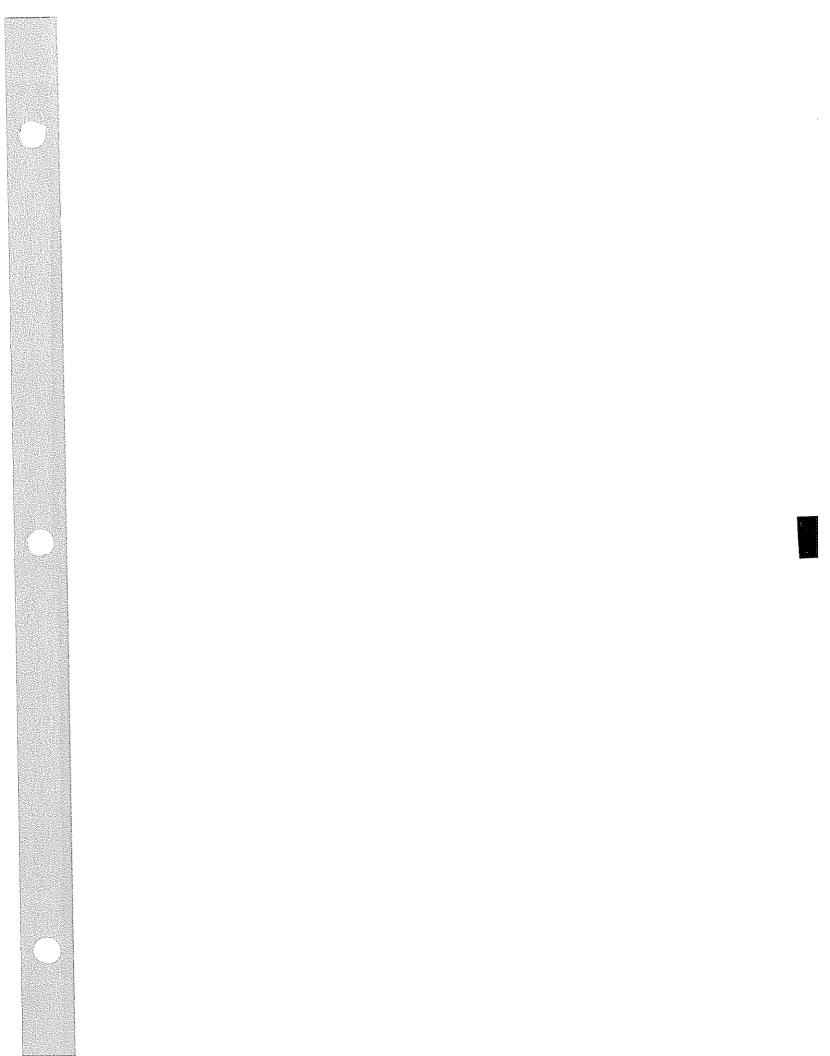
Response:

	2007		2006		<u>2005</u>
Vacation / Sick Hours	571	_	379	•	553
Associated expenses	\$ 11,144	\$	7,882	\$	11,307

b. What are the number of Vac/Sick hours underlying the pro forma test year expenses of \$11,546?

Response:

	<u>rest rear</u>
Vacation / Sick Hours	565
Associated expenses	\$ 11,546



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Item # 16
Page 1 of 1
Witness: Don Combs

Grayson Rural Electric Case No. 2008-00254

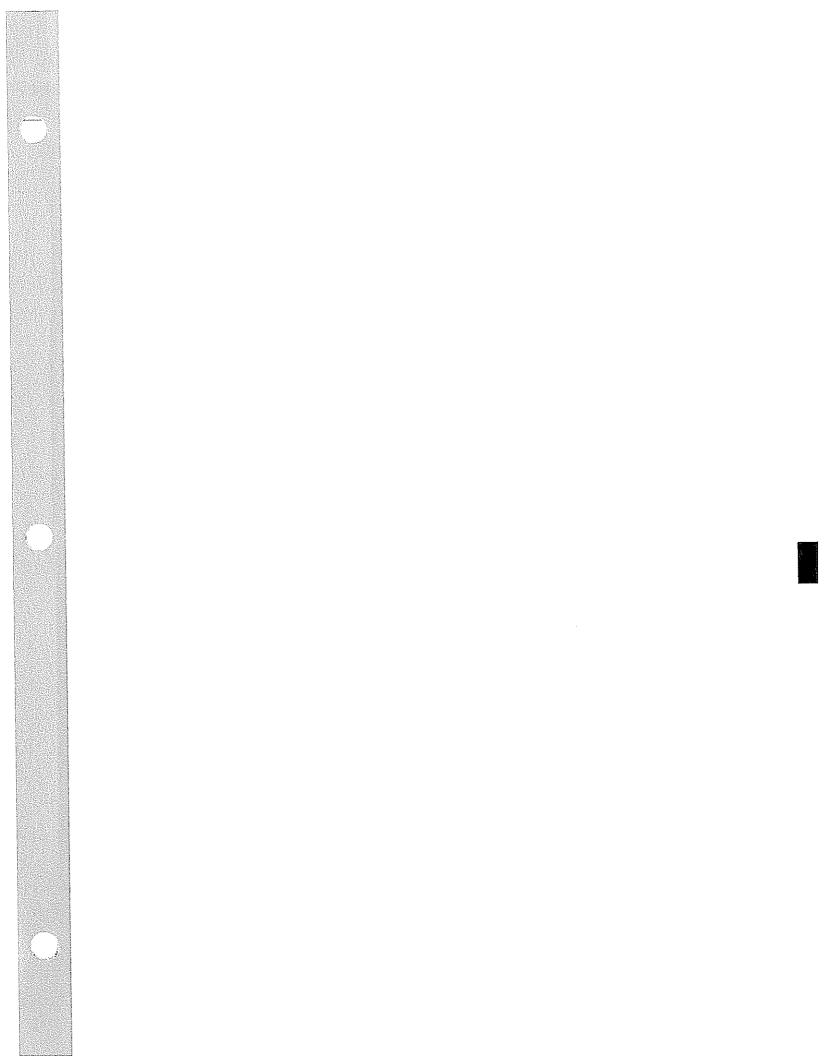
1st Data Request of the Attorney General

Exhibit 1, pages 3 and 4 show that the test year had 10 salaried employees who worked a total number of regular hours of 20,720 and 34 hourly employees who worked a total number of hours of 68,668. For each of the three years prior to the test year, provide the same type of actual information, Le., the total number of salaried employees and the associated total number of hours worked and the total hourly employees and the associated total number of hours worked.

In addition, provide the number of number of regular salaried employee hours underlying the pro forma test year expenses of \$660,899 and the actual number of regular hourly employee hours underlying the pro forma test year expenses of \$1,511,827.

Response:

Response:	(Prior to test year)	2007	2006	<u>2005</u>
Salaried Employees Total Hours		18,070	18,191	18,410
Hourly Employees Total Hours		61,572	63,571	65,656
Salaried Employees Total Hours	1	<u> </u>		
Hourly Employees Total Hours		68,668		
	\$ 1,	511,827		



Initial Requests For Information of the Attorney General

Question 17
Page 1 of 1
Witness: Alan Zumstein

- With regard to Exhibit 9, page 3 (Professional Services Expenses), please provide the following information:
 - a Nature and purpose of the \$195 charge for the NRECA Personal Practice Pointers subscription

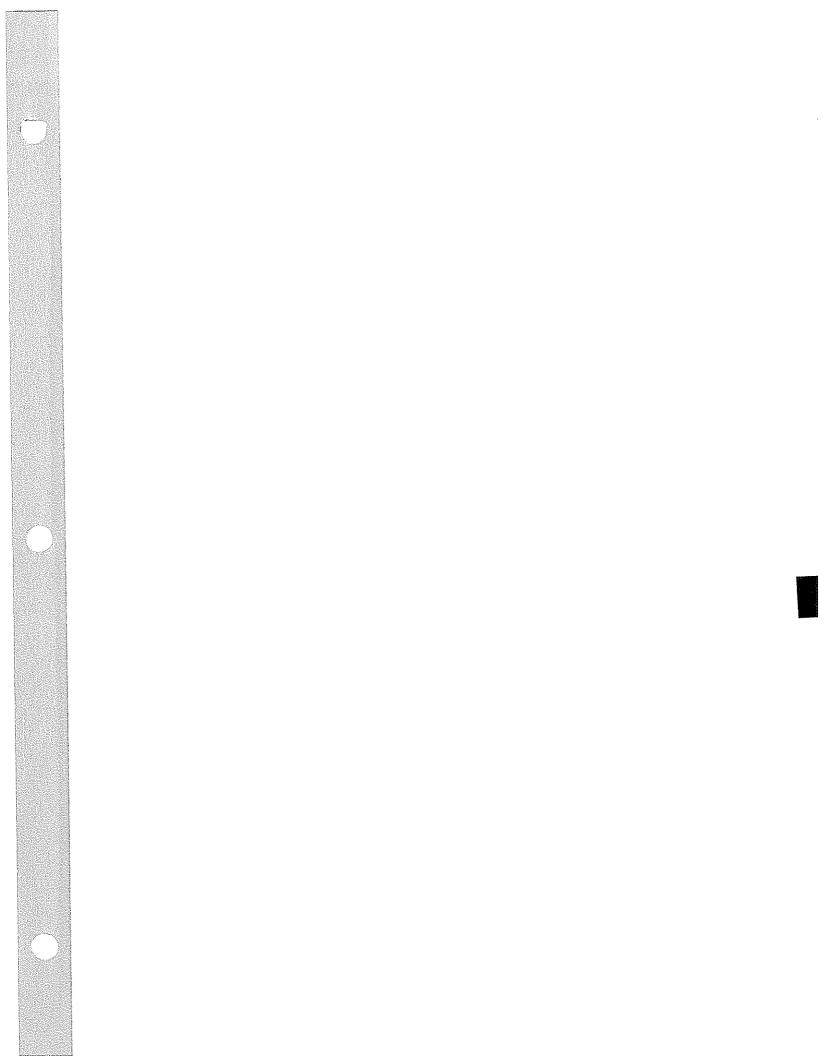
Response: NRECA sends issues that effect cooperative and employment issues for both management and legal staffs of cooperatives

b. The claimed expenses in this case include \$155 for a NRECA Legal Reporting subscription, \$43 for a NRECA RE Magazine subscription, and \$495 for a NRECA legal seminar registration. Is Grayson aware of the PSC policy that these type of attorney expenses are not allowed for ratemaking purposes?

Response: NRECA and KAEC have seminars specifically related to legal issues that effect electric cooperatives and the electric industry specifically. Grayson feels it is very important for its attorney to be abreast of issues that affect them. Attending these meetings and receiving industry specific magazines assists Grayson in maintaining compliance with local and national laws and regulations that affect the electric industry.

Since Grayson's attorney attends meetings specifically related to legal issues affecting the electric industry, Grayson is of the opinion that these expenses should be included for rate making purposes

The board of directors, management and especially the members benefit by having the legal department be on a retainer and paying him for these services than by having an inhouse legal department to pay full-time wages and benefits, and in turn send them to the NRECA and KAEC legal seminars, and pay for these subscriptions, too

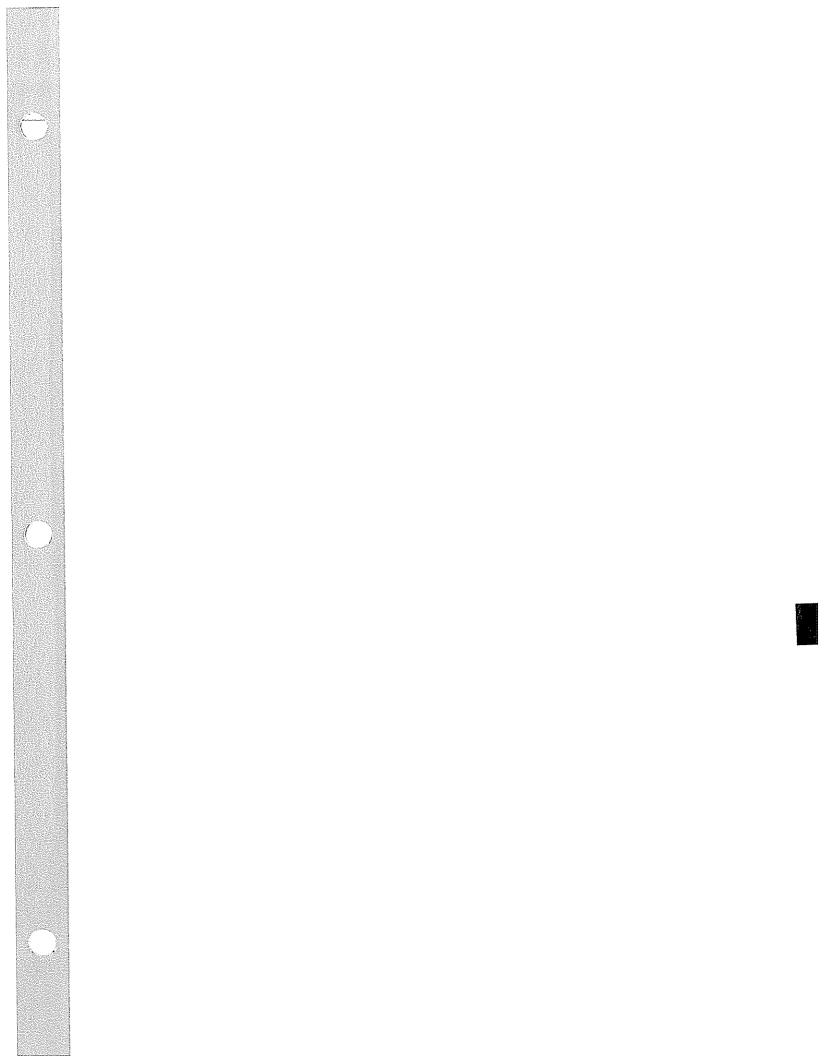


Initial Requests For Information of the Attorney General

Question 18 Page 1 of 1 Witness: Alan Zumstein

With regard to rate case expenses, please provide the actual expenses incurred to date for the current rate case, in total and broken out by expense component per Exhibit 12.

Response: See PSC 2-24 b



Item # 19 Page 1 of 2

Witness: Don Combs

Grayson Rural Electric Case No. 2008-00254

1st Data Request of the Attorney General

- With regard to Exhibit 11, pages 3 and 4 (Miscellaneous Expenses), please provide the following information:
- a. Nature and purpose of the items called "Safety consumer giveaways." In addition, provide a sample picture of these giveaways, if available.

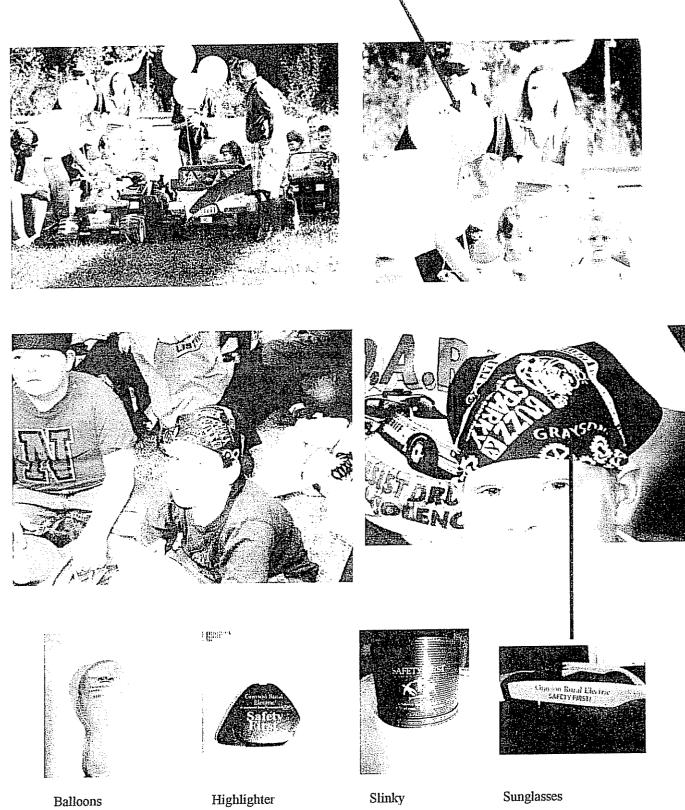
Response:

"Safety Consumer Givaways" are small items, such as pencils, highlighters, etc., which are given to school children from kindergarten through 8th grade during programs that focus on electrical safety, energy conversation and efficiency. These are also utilized at public events, such as county fairs.

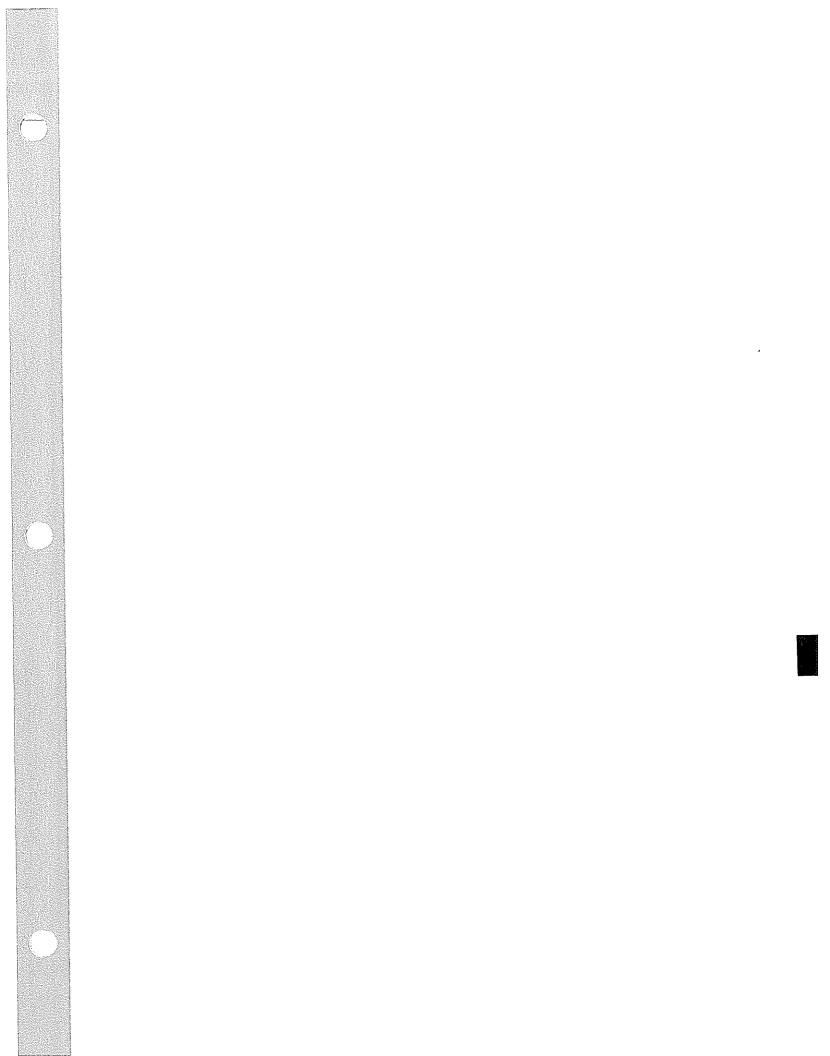
b. Nature and purpose of the items called "Safety message on bandanas & magnet." In addition, provide a sample picture of these items, if available.

Response:

"Safety message on bandana & magnet" are examples of those items in 19(a). Samples are shown on Page 2 of 2



Highlighter



Initial Requests For Information of the Attorney General

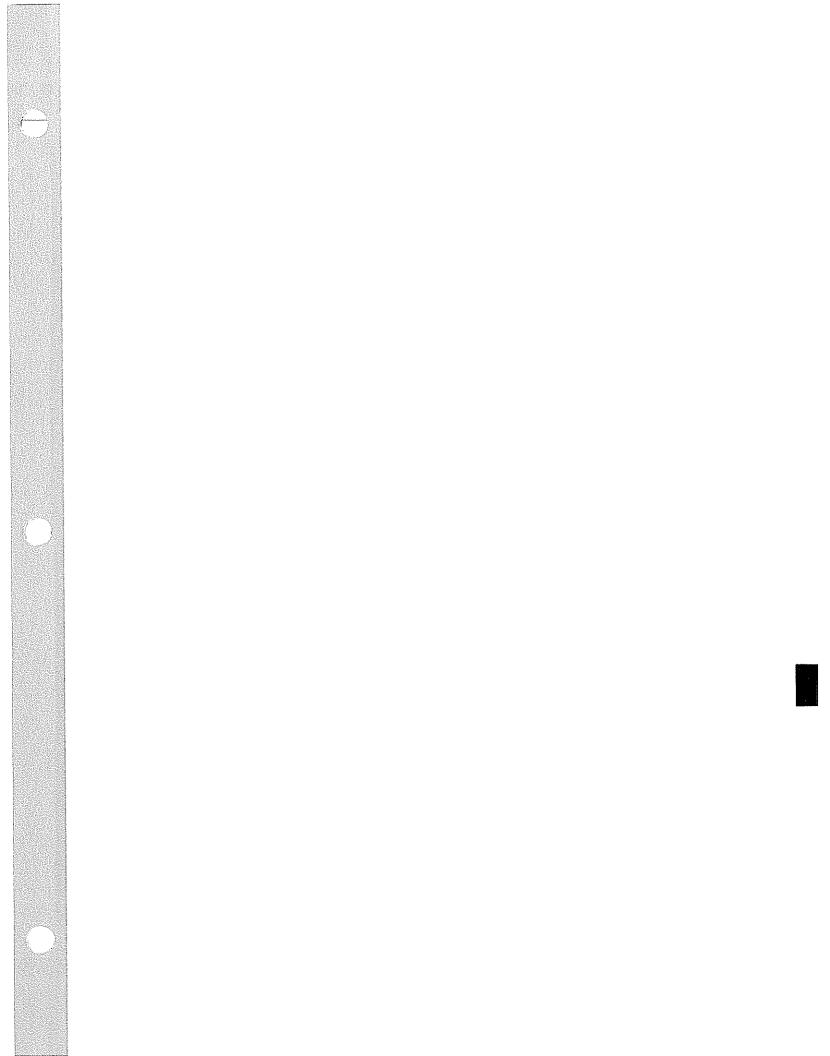
Question 20 Page 1 of 1

Witness: Alan Zumstein

Please provide the KAEC dues and NRECA dues paid in each of the three years prior to the test year.

Response: Dues for the past 3 years are as follows:

	NRECA	KAEC	
2007	16,506	37,908	
2006	15,966	36,684	
2005	15,367	35,990	

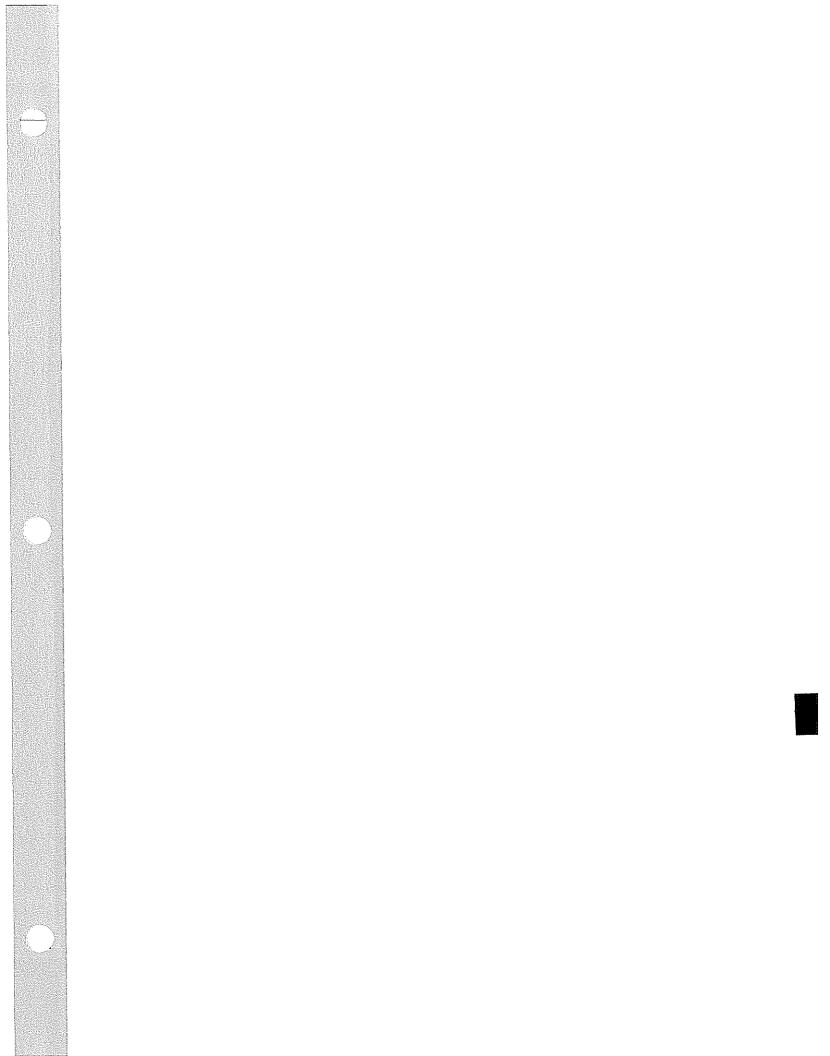


Grayson Rural Electric Cooperative Case No. 2008-00254

Question 21 Page 1 of 1 Witness: Don Combs

Account 921, Office Supplies Ag Initial Request, Question 21

<u>Date</u>	Check <u>Number</u>	<u>Payee</u>	<u>Amount</u>	<u>Description</u>
var	var	Kentucky Power Company	5,770.11	Electric use
var	var	Netgain Tech, Inc.	14,410.71	Licenses renewals
var	var	Grayson Utilities	2,407.01	Water and sewage expenses
var	var	Windstream	2,234.40	Telephone charges
var	var	MPC-Pro, LLC (Gateway)	428.61	PC warranties
var	var	Ikon Office Solutions	1,625.44	Printer cartidges
var	var	KAEC	458.00	Meeting fees
3/6/2008	144011	Milsoft Utility Solutions	695.00	User seminar fee
var	var	NRECA	1,795.00	Meeting fees
var	var	SEDC	4,922.50	Computer support
var	var	Service Office Supply	5,805.16	Office supplies
var	var	Sam's Club	1,988.01	Office cleaning supplies
var	var	Visa	26,148.34	Employee meetings exp and fees
var	var	AT&T	477.48	Telephone charges
var	var	Computer Forms & Mktg	741.22	Checks
var	var	Data House	1,435.66	Ink cartidges
var	var	Pitney Bowes	2,220.85	Postage for machine
3/14/2008	144426	Land's End	1,436.75	Annual mtg shirts
var	var	Calvin's Convenient Store	189.21	Snacks for employee mtgs
var	var	Videos & More	168.92	Cable adapters
9/7/2007	142468	KAEC	370.00	KMMA registrtion fee
var	var	Suddenlink Comm	615.19	Cable service
var	var	Vebridge	2,700.00	Image storage
1/3/2008	143511	Tamco Capital	1,928.00	Upgrade phone system
3/27/2008	144156	PC Connection Sales	1,337.08	10 Back up UPS storage
3/24/2008	144135	KY State Treas	540.00	U/G storage fees
less	than \$100	each	2,237.73	
DOM	l, crime insi	urance	3,849.00	
		Journal entry	106.12	Postage
Milea	ge reimbur	sement	741.20	Employee use of personal vehicle
EK	PC Partner	Plus	<u>(448.83)</u>	
			89,333.87	

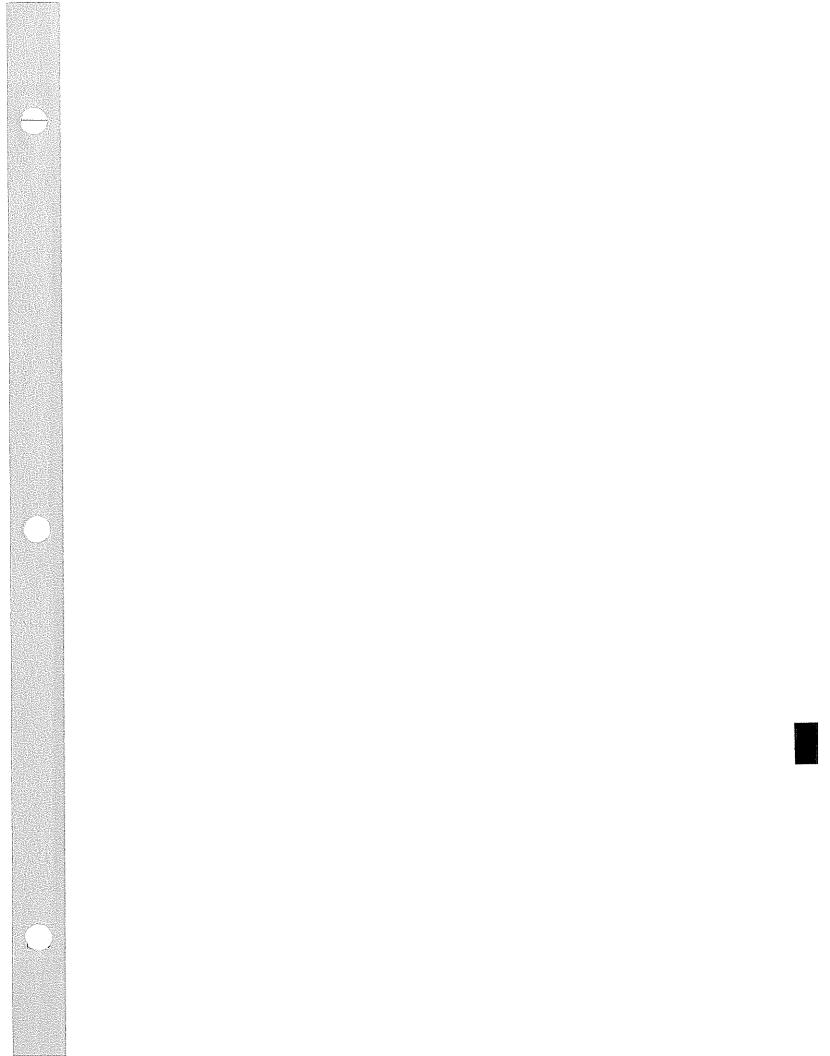


Initial Requests For Information of the Attorney General

Question 22 Page 1 of 1 Witness: Alan Zumstein

What represents the Other Interest expense amount of \$70,941 shown on Exhibit S, page 2?

Response: Interest on customer deposits



Initial Requests For Information of the Attorney General

Question 23 Page 1 of 1 Witness: Alan Zumstein

Please reconcile the per books and pro forma depreciation expenses of \$1,553,623 and \$2,406,025 shown on Exhibit 3, page 3 of 6 to the per books and pro forma depreciation expenses of \$1,559,510 and \$1,985,711 on Exhibit S, page 2 of 4.

Response: See PSC 2-13, and PSC2-28 c.