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COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

PUBLIC SERVICE
COMMISSION

In the Matter of:

APPLICATION OF CLARK ENERGY)
COOPERATIVE, INC. FOR AN) CASE NO. 2009-00314
ADJUSTMENT OF RATES)

ATTORNEY GENERAL'S INITIAL REQUESTS FOR INFORMATION

Comes now the intervenor, the Attorney General of the Commonwealth of Kentucky, by and through his Office of Rate Intervention, and submits these Initial Requests for Information to Clark Energy Cooperative, Inc. [hereinafter referred to as "Clark"] to be answered by the date specified in the Commission's Order of Procedure, and 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 request item will be deemed a satisfactory response.

(2) Please identify the witness who will be prepared to answer questions concerning each request.

(3) Please repeat the question to which each response is intended to refer. The Office of the Attorney General can provide counsel for Clark with an electronic version of these questions, upon request.

(4) These requests shall be deemed continuing so as to require further and supplemental responses if the company 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.

(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 any request appears confusing, please request clarification directly from 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, please notify the Office of the Attorney General as soon as possible.


(10) 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.

(11) 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.

(12) Please provide written responses, together with any and all exhibits pertaining thereto, in one or more bound volumes, separately indexed and tabbed by each response.

Respectfully submitted,
JACK CONWAY
ATTORNEY GENERAL


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Certificate of Service and Filing

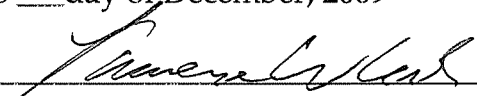
Counsel certifies that an original and ten photocopies of the foregoing were served and filed by hand delivery to Jeff Derouen, Executive Director, Public Service Commission, 211 Sower Boulevard, Frankfort, Kentucky 40601; counsel further states that true and accurate copies of the foregoing were mailed via First Class U.S. Mail, postage pre-paid, to:

Paul G. Embs
Clark Energy Cooperative, Inc.
P. O. Box 748
Winchester, KY 40392-0748

Hon. Mark David Goss
Frost, Brown, Todd, LLC
250 W. Main St.
Ste. 2700
Lexington, KY 40507

Hon. Robert L. Rose
Attorney at Law
51 South Main St.
Winchester, KY 40391

this 16th day of December, 2009



Assistant Attorney General

CLARK ENERGY COOPERATIVE, INC.
Case No. 2009-00314
Attorney General's Initial Requests for Information to Clark

1. Clark's application states it is seeking relief from the order entered in PSC Case No. 92-219. Provide the date of the order Clark references, and please provide a copy of that order.
 - a. Explain why Clark believes that it will need "full margins," as set forth in numerical paragraph 5(e) of its application, for future years in order to restore the company's financial status.
 - b. If the PSC grants this relief, how does Clark propose to retire its capital credits earned in excess of a 2.0 TIER?
2. Exhibit 14 states Clark will remove \$125,811.28 from Account 593.20, Ice Storm Expenses. Will Clark seek any amounts in other accounts or otherwise from its ratepayers regarding expenses it incurred as a result of the 2009 ice storm, or wind events of 2008 and 2009?
3. Clarify whether the proposed "Facility Charge" referenced in the company's proposed new tariffs is merely another name for a monthly customer charge, or is it another charge in addition to the customer charge?
4. Identify by name the organizations in which employees of Clark or members of its Board of Directors serve as directors. Identify the nature of each such organization's business.
5. State whether Pacificare Health Plan Administrators, Inc. (d/b/a Preferred Plan; d/b/a Preferred Plan of Kentucky) conducts any business with Clark, and if so, the nature of those business transactions.
6. With regard to account 593.90 (Contract Right of Way), state the reason for the increase in the test year amount of \$888,539 from the prior year, \$659,289. Provide the total sum spent in this account for each of the past five (5) years.
7. With regard to account 598.00 (Maintenance, Misc. Distribution), state the reason for the increase in the test year of \$103,644 from the prior year, \$65,034.
8. With regard to account 920.00 (Administrative Salaries), state the reason for the increase from the test year sum of \$440,654 to the prior year's sum of \$403,914.