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PUBLIC SERVICE  
COMMISSION

COMMONWEALTH OF KENTUCKY  
BEFORE THE KY PUBLIC SERVICE COMMISSION  
CASE NO. 2012-00224

In The Matter Of:

The Petition and Complaint of Kentucky Power Company

KENTUCKY POWER COMPANY,

PETITIONER,

VS.

*MOTION*

GRAYSON RURAL ELECTRIC  
COOPERATIVE CORPORATION,

RESPONDENT.

Comes now Grayson Rural Electric Cooperative Corporation, by and through Counsel, and hereby moves the Commission for an order allowing the filing of the attached answer beyond the 20 day time period provided for in an earlier order.

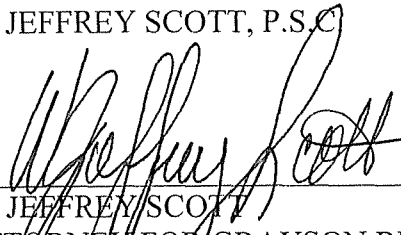
In support of this motion the undersigned counsel for Grayson Rural Electric Cooperative Corporation was not made aware of the specific time period in which to file an answer. As such the time allowed did not get calendared.

The undersigned counsel respectfully submits that the answer will not unduly prejudice the complainant.

RESPECTFULLY SUBMITTED,

W. JEFFREY SCOTT, P.S.C.

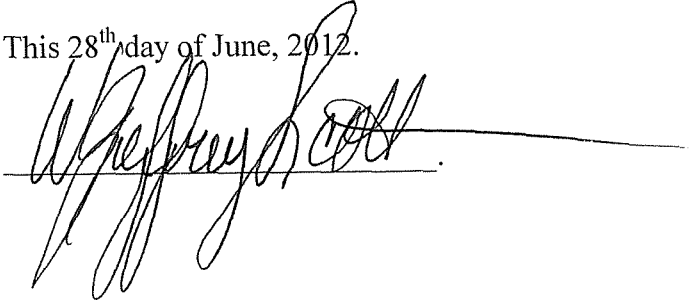
BY: \_\_\_\_\_

  
W. JEFFREY SCOTT  
ATTORNEY FOR GRAYSON RURAL  
ELECTRIC COOPERATIVE CORPORATION  
311 WEST MAIN STREET  
P.O. BOX 608  
GRAYSON, KY 41143  
(606) 474-5194

This is to certify that the foregoing Answer  
has been served on the parties herein by  
mailing a true and correct copy of same to:

Hon. Mark R. Overstreet  
Stites & Harbison PLLC  
421 W. Main St.  
P.O. Box 634  
Frankfort, KY 40602-0634

This 28<sup>th</sup> day of June, 2012.

A handwritten signature in black ink, appearing to read "Jeffrey K. Bell", is written over a horizontal line. The signature is cursive and extends to the right of the line.

**COMMONWEALTH OF KENTUCKY  
BEFORE THE KY PUBLIC SERVICE COMMISSION  
CASE NO. 2012-00224**

In The Matter Of:

The Petition and Complaint of Kentucky Power Company

KENTUCKY POWER COMPANY,

PETITIONER,

VS.

*ANSWER*

GRAYSON RURAL ELECTRIC  
COOPERATIVE CORPORATION,

RESPONDENT.

Comes now Grayson Rural Electric Cooperative Corporation, by and through counsel, and for its answer to the Complaint and Petition herein states as follows:

1. The Grayson Rural Electric Cooperative Corporation (hereinafter CO-OP) denies that it has supplied retail electric service to any location in an improvident manner.
2. The CO-OP states that the Complaint of Kentucky Power should be denied based upon an accord reached between Kentucky Power and Grayson several years ago allowing CO-OP to supply retail electric service to the two entities complained of in the Complaint.
3. The CO-OP further asserts that Kentucky Power should be stopped from asserting any complaint as alleged in its June 1, 2012, Complaint and Petition based upon this accord reached earlier.
4. CO-OP further states that there are other service territories in and around Grayson, Kentucky, namely Valley View Subdivision in which Kentucky Power serves residential customers located within the certified service territory of CO-OP and the Commission when investigating this matter should look to that scenario as well as that which is complained of by Kentucky Power in the within Complaint and Petition.

5. To allow Kentucky Power to serve the residential customers mentioned in its Complaint would result in duplication of services and a blight on the landscape such that the requested relief should be denied.

**WHEREFORE**, the CO-OP asks that the Complaint be dismissed or that alternatively a hearing be fixed by appropriate order and service upon counsel at which a full investigatory hearing may bring forth an appropriate remedy. CO-OP further requests an informal conference.

RESPECTFULLY SUBMITTED,

W. JEFFREY SCOTT, P.S.C.

BY: 

W. JEFFREY SCOTT  
ATTORNEY FOR GRAYSON RURAL  
ELECTRIC COOPERATIVE CORPORATION  
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