

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

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PUBLIC SERVICE
COMMISSION

In the Matter Of:

Petition And Complaint Of Kentucky Power)
Company For A Declaration Of Its Exclusive)
Right Pursuant to KRS 278.018(1) To Serve)
Those Portions Of The Sand Gap)
Estates In Greenup County, Kentucky Lying)
Within Its Certified Territory In Lieu Of)
Grayson Rural Electric Cooperative Corporation)

Case No. 2012-00224

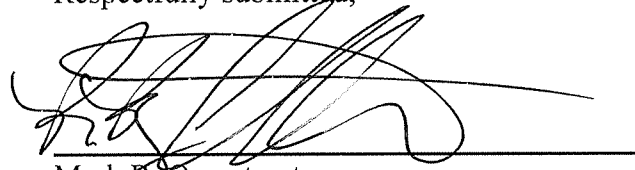
**KENTUCKY POWER COMPANY'S RESPONSE TO GRAYSON RURAL ELECTRIC
COOPERATIVE CORPORATION'S MOTION FOR EXTENSION OF TIME TO
SERVE DISCOVERY REQUESTS**

Grayson Rural Electric Cooperative Corporation ("GRECC") has moved the Commission for an extension of time to serve data requests upon Kentucky Power Company ("Kentucky Power"). In the absence of this relief, GRECC states that it will be denied "procedural due process" and "substantive rights" because the Commission's Order of November 8, 2012 setting procedural deadlines was mailed to GRECC's corporate headquarters rather than to its legal counsel in this matter. GRECC cites to no legal authority supporting its claim that it will be denied procedural and substantive rights in the absence of the requested extension.

Kentucky Power disagrees that GRECC will be deprived of procedural due process and substantive rights if the extension is not granted. It is undisputed that GRECC had notice of the Commission's November 8, 2012 Order and the procedural deadlines it established. Indeed, GRECC's extension motion acknowledges that the Commission mailed the November 8, 2012 Order setting the procedural deadlines to GRECC's corporate headquarters. GRECC offers no explanation for why it did not forward the Order onto its counsel or otherwise make an effort to in the Commission's Order.

Kentucky Power does not object to GRECC's extension request provided that all subsequent deadlines set forth in the Commission's November 8, 2012 Order are adjusted to account for the additional time provided to GRECC. For example, if the Commission grants GRECC an additional twenty days to serve its data requests on Kentucky Power then all subsequent deadlines should also be extended by twenty days to avoid prejudice to Kentucky Power.

Respectfully submitted,



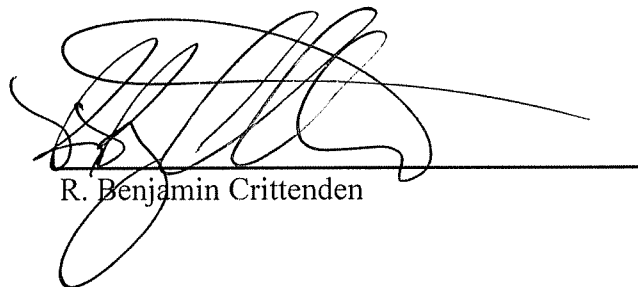
Mark R. Overstreet
R. Benjamin Crittenden
STIPES & HARBISON PLLC
421 West Main Street
P. O. Box 634
Frankfort, Kentucky 40602-0634

COUNSEL FOR KENTUCKY POWER
COMPANY

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served by first class mail, postage prepaid, upon the following on this 28th day of November, 2012.

W. Jeffrey Scott
311 West Main Street
Grayson, Kentucky 41143



R. Benjamin Crittenden