

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

IN RE: THE 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,

RECEIVED

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PUBLIC SERVICE
COMMISSION

**GRAYSON RURAL ELECTRIC COOPERATIVE CORPORATION
DATA REQUEST TO KENTUCKY POWER COMPANY**

Pursuant to previous Orders of the Kentucky Public Service Commission, Grayson Rural Electric Cooperative Corporation (GRECC) propounds the following data request to be answered by Kentucky Power Company:

1. Please state whether Kentucky Power agrees that representatives of Kentucky Power and GRECC agreed for Kentucky Power to serve persons on the east side of the Industrial Parkway in Greenup County immediately east of Sand Gap Estates and for GRECC to serve persons or other entities located on the west side of the Industrial Parkway within the Sand Gap Estates area.
2. If the answer to the preceding request is in the affirmative, then please state all of the individuals involved in reaching that decision.
3. Please state whether Kentucky Power denied electric service to any individual seeking same within the Sand Gap Estates area upon application being made, and if so, please state the individual or entity making the request and when the denial was made.

4. Please provide the name, title and brief summary of the anticipated testimony of each witness which Kentucky Power intends to call at any hearing held in the within action.
5. Please state whether Kentucky Power acknowledges that at least one electric consuming facility in Sand Gap Estates is located within a service territory of GRECC as set forth in the Territorial Map of record at the Kentucky Public Service Commission.
6. If the answer to the preceding request is in the affirmative, then please state which service and the name of the electric consuming facility owner.
7. Please state what effort, if any, Kentucky Power made to reach an agreement with GRECC regarding the issues raised in the within proceeding.
8. Please provide copies of all maps, surveys or other documents which Kentucky Power contends support its allegations in the within complaint.
9. Please state whether Kentucky Power acknowledges that there are electric consuming facilities in the Valley View Subdivision near Grayson, Kentucky served by Kentucky Power when same is located within the certified territory of GRECC.
10. If the answer to the preceding request is in the affirmative, please set forth the name and address of those persons and the usage of power by each in the last fifteen years.
11. Please set forth a factual basis for the assertion that service by GRECC to the area complained of in the Complaint and Petition of Kentucky Power will result in inconvenience, diminished deficiency and higher costs in serving the area.

Respectfully submitted,

W. JEFFREY SCOTT, PSC

BY: _____

W. JEFFREY SCOTT
P.O. BOX 608
GRAYSON, KY 41143
(606) 474-5194

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

Hon. Mark R. Overstreet
Stites & Harbison, PLLC
421 W. Main Street
P.O. Box 634
Frankfort, KY 40602-0634
and by e-mail:
moverstreet@stites.com

This is to further certify that the original of this Document has been forwarded to the Kentucky Service Commission as follows:

Faith.burns@ky.gov

and

Kentucky Public Service Commission
211 Sower Blvd.
Frankfort, KY 40602-0615

Via: U.S. Mail and facsimile 502-564-7279

This the 12th day of December, 2012.

W. Jeffrey Scott