

Grayson Rural Electric Cooperative Corporation

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January 22, 2013


Mr. Jeff Derouen, Executive Director
Kentucky Public Service Commission
211 Sower Boulevard
Frankfort, Kentucky 40602

Case No. 2012-00224

Dear Mr. Derouen:

Attached are an original and nine copies of the Verified Testimony of Grayson Rural Electric Cooperative Corporation in this matter.

Sincerely,


Carol Hall Fraley, President and CEO
Grayson Rural Electric Cooperative Corporation

CHF/pfs

Attachments (10)

RECEIVED

JAN 23 2013

PUBLIC SERVICE
COMMISSION

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

RECEIVED

JAN 23 2013

PUBLIC SERVICE
COMMISSION

In the Matter of:

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,)

CASE NO.
2012-00224

**VERIFIED TESTIMONY OF GRAYSON RURAL ELECTRIC
COOPERATIVE CORPORATION**

Comes now Grayson Rural Electric Cooperative Corporation and herewith files its verified testimony in accordance with the prior Order of the Commission.

The testimony consists of the testimony of Ronnie Evans, retired field engineer for Grayson Rural Electric Cooperative Corporation and Carol Ann Fraley, President and CEO of Grayson Rural Electric Cooperative Corporation.

CAROL ANN FRALEY

Comes now Carol Ann Fraley after first being duly sworn deposes and states as follows:

My name is Carol Ann Fraley and I am President and CEO of Grayson Rural Electric Cooperative Corporation (GRECC) and have been employed as such since 1994. Prior to that time I was Member Services Director for approximately 15 years at GRECC.

My knowledge of the matter concerning electric service provided to the Sand Gap Estates area located on the Industrial Parkway between Interstate 64 and US 23 in Greenup County is set forth herein to the best of my recollection.

In approximately February of 2005 Wesley Breeding, who had been a prior member of GRECC, came to the office to apply for service to a residence that he was having constructed along the Industrial Parkway in Greenup County in the Sand Gap Estates area. Mr. Breeding had been a prior member of GRECC while living in the Rakes Mill Road area near South Shore in Greenup County. His daughter, Tamela Martin, had applied for service with GRECC as well. In a conversation with Mr. Breeding, he said that he had talked with representatives at Kentucky Power and was told by Kentucky Power that the location of the residences of he and his daughter were in the service territory of GRECC.

I also learned that Mark Terry had applied for service in this same area for a residence after he had been told that the area on which he wanted to construct his house was in the service territory of GRECC. That particular house is now owned by a Mr. Porter. Since the filing of the action by Kentucky Power I have learned that the house is partially situated in the area Kentucky Power alleges to be their service territory.

In addition I have had conversations with Doug Moore, representative of the former owner of the area, Addington Land Company, about the subject of this Kentucky Power

complaint with the Public Service Commission. I have learned from Mr. Moore that Kentucky Power representatives had advised him that the area of dispute was situated in GRECC service territory. Also, Mr. Moore advised me that an individual who had purchased the Industrial Parkway frontage located on the west side of Industrial Parkway, the Industrial Parkway being a north south highway, had been advised as well by Kentucky Power that that entire frontage was in GRECC's service territory.

I have had no personal discussions prior to the initiation of this matter with anyone from Kentucky Power.

I am unaware of why Kentucky Power waited from 2005 to the filing of this action to initiate a controversy over what GRECC felt was a noncontroversial subject.

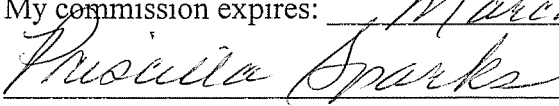
I have read the foregoing and state that it is true and correct to the best of my knowledge and belief.


CAROL ANN FRALEY

STATE OF KENTUCKY

COUNTY OF CARTER

Subscribed and sworn to before me by **CAROL ANN FRALEY** this 22nd day of January, 2013.

My commission expires: March 22, # 2013

NOTARY PUBLIC, KENTUCKY STATE AT LARGE

RONNIE EVANS

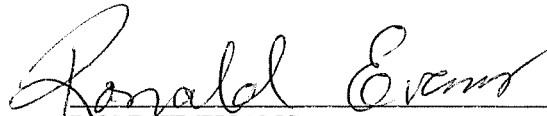
Comes now Ronnie Evans after first being duly sworn deposes and states as follows:

My name is Ronnie Evans and I am a retired field engineer for Grayson Rural Electric Cooperative Corporation (GRECC).

Upon application for service being made by Tamela Martin, Mark Terry, and Wesley Breeding it was necessary to learn the location of where service would be provided and to stake the work to be performed. I met with Doug Moore, Addington Land Company representative, who had advised that the Kentucky Power representatives had informed him that the particular locations for this service were located in GRECC territory. We did not have GPS at that time and tried to rely upon existing maps. The roadway having been constructed from Interstate 64 to US 23 had been constructed along an area that had been formerly strip mined. The entirety of this roadway was on land that had been deeded to the State by the Addington Corporation and had been land on which governmental leaders had utilized to put together a highway to bring together the Ohio River towns in Greenup County with Interstate 64. After this strip mining had been done and the other work done for the highway, the previously existing monuments were removed making it difficult to match the current sight with territorial maps on file. In fact the ridgeline had been altered to the point that the maps were of little benefit.

The closest Kentucky Power line is located behind the Sand Gap Church and across Sand Gap Road. Mr. Moore had advised me that a line would have to be built around the church and across church property to even get to the Sand Gap Estates subdivision property. The next closest line would have been across the Industrial Parkway and down the hill, almost to Naples in Greenup County, approximately 1 ½ miles.

I have read the foregoing and state that it is true and correct to the best of my knowledge and belief.

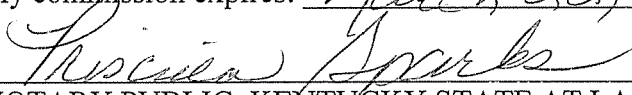


RONNIE EVANS

STATE OF KENTUCKY

COUNTY OF CARTER

Subscribed and sworn to before me by **RONNIE EVANS** this 22nd day of January, 2013.

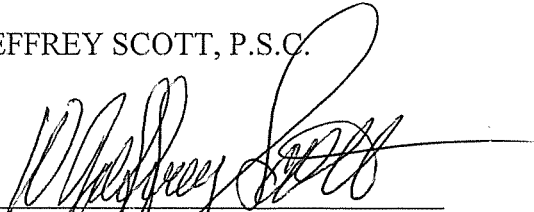
My commission expires: March 22, # 2013


NOTARY PUBLIC, KENTUCKY STATE AT LARGE

RESPECTFULLY SUBMITTED,

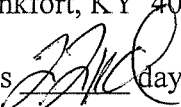
W. JEFFREY SCOTT, P.S.C.

BY:


W. JEFFREY SCOTT
ATTORNEY FOR GRECC
311 WEST MAIN STREET
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 Overstreet
Stites & Harbison PLLC
421 West Main Street
P.O. Box 634
Frankfort, KY 40602-0634

This  day of January, 2013.