

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

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In the Matter of:

JAN 02 2013

PETITION AND COMPLAINT OF GRAYSON )  
RURAL ELECTRIC COOPERATIVE CORPORATION )  
OR AN ORDER AUTHORIZING PURCHASE OF )  
ELECTRIC POWER AT THE RATE OF SIX )  
CENTS PER KILOWATT HOUR UP TO 9.4 )  
MEGAWATTS OF POWER VS. A RATE IN )  
EXCESS OF SEVEN CENTS PER KILOWATT )  
HOUR PURCHASED FROM EAST KENTUCKY )  
POWER COOPERATIVE UNDER A WHOLESALE )  
POWER CONTRACT AS AMENDED BETWEEN )  
GRAYSON RURAL ELECTRIC COOPERATIVE )  
CORPORATION AND EAST KENTUCKY POWER )  
COOPERATIVE INC. )

PUBLIC SERVICE  
COMMISSION

CASE NO.  
2012-00503

**RESPONSE OF PETITIONER, GRAYSON RURAL ELECTRIC COOPERATIVE CORPORATION, TO MOTION OF RESPONDENT, EAST KENTUCKY POWER COOPERATIVE, FOR AN ADDITIONAL TIME WITHIN WHICH TO ANSWER:**

1. The Petitioner, Grayson Rural Electric Cooperative Corporation, (GRECC) states that the Respondent has set forth disingenuous assertions in its request for an extension of time, not the least of which is the assertion that the within complaint has as its primary purpose, "establishing a defense to EKPC's Counterclaim in the Mason Circuit Court".
2. Petitioner need assert no further defense to that Counterclaim beyond that which has been set forth in Petitioner's Motion to Dismiss the Counterclaim that is now pending in the Mason Circuit Court.
3. The Motion to Dismiss the Counterclaim in the Mason Circuit Court would, in all likelihood, have been ruled upon prior to this time had East Kentucky Power Cooperative not decided, at the last minute, to hire the Judge's uncle as one of its attorneys to defend that case.

4. The Mason Circuit Court proceeding is on hold while a recusal request is being administered.
5. However, Grayson Rural Electric Cooperative Corporation, has no objection to the extension of time to January 12, 2013, for East Kentucky Power Cooperative to answer as GRECC knows of the January 2 Board Meeting of EKPC that has already been scheduled to discuss this matter.

RESPECTFULLY SUBMITTED,

W. JEFFREY SCOTT, PSC

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

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P.O. BOX 608  
GRAYSON, KY 41143  
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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 David Goss  
Hon. David S. Samford  
GOSS SAMFORD, PLLC  
2365 Harrodsburg Road, **Suite B 130**  
Lexington, KY 40504

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

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

This the 27th day of December, 2012.

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