

CRAWFORD & BAXTER, P.S.C.

ATTORNEYS AT LAW
523 Highland Avenue
P.O. Box 353
Carrollton, Kentucky 41008

RECEIVED

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PUBLIC SERVICE
COMMISSION

Phone: (502) 732-6688

1-800-442-8680

Fax: (502) 732-6920

Email: CBJ523@AOL.COM

James M. Crawford
Ruth H. Baxter

July 26, 2013

Mr. Jeffrey Derouen
Executive Director
Kentucky Public Service Commission
P.O. Box 615
211 Sower Boulevard
Frankfort, KY 40602

RE: PSC Case No. 2012-00503

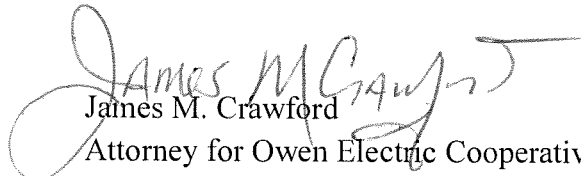
Dear Mr. Derouen:

Please find enclosed for filing with the Commission in the above-referenced proceeding, an original and ten copies of Owen Electric Cooperative, Inc.'s ("Owen Electric") Motion for Full Intervention, and an original and ten redacted copies of Owen Electric's response to the issues discussed in the Commission's Order dated July 17, 2013. Also enclosed is an original and ten copies of Owen Electric's Motion for Confidential Treatment of Information. One copy of the designated confidential portions of the responses is enclosed in a sealed envelope.

Please contact me with any questions.

Respectfully yours,

CRAWFORD & BAXTER, P.S.C.


James M. Crawford
Attorney for Owen Electric Cooperative, Inc.

cc: Parties of Record

**COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION**

In the Matter of:

PETITION AND COMPLAINT OF GRAYSON)	
RURAL ELECTRIC COOPERATIVE)	
CORPORATION FOR AN ORDER)	
AUTHORIZING PURCHASE OF ELECTRIC)	
POWER AT THE RATE OF SIX CENTS PER)	
KILOWATTS OF POWER VS A RATE IN)	
EXCESS OF SEVEN CENTS PER KILOWATT)	CASE NO.
HOUR PURCHASED FROM EAST KENTUCKY)	2012-00503
POWER COOPERATIVE UNDER A)	
WHOLESALE POWER CONTRACT AS)	
AMENDED BETWEEN GRAYSON RURAL)	
ELECTRIC COOPERATIVE CORPORATION)	
AND EAST KENTUCKY POWER)	
COOPERATIVE INC.)	

MOTION FOR CONFIDENTIAL TREATMENT OF INFORMATION

Comes now Owen Electric Cooperative, Inc. (“Owen Electric”) and, as grounds for this Motion for Confidential Treatment of Information (the “Motion”), states as follows:

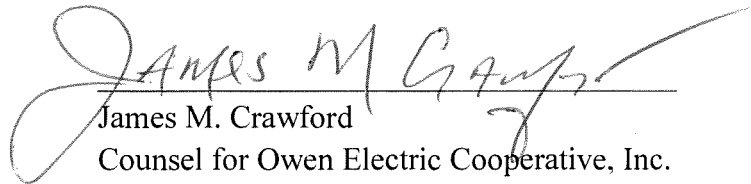
1. This Motion is filed in conjunction with the filing of Owen Electric’s Motion for Full Intervention, supported by a response to the issues discussed in the Commission’s Order dated July 17, 2013, and relates to confidential information contained into Exhibits “B” and “C” attached thereto that is entitled to protection pursuant to 807 KAR 5:001 Section 13 and KRS 61.878(1)(c)1 and related sections.
2. The information is designated as confidential in Exhibits “B” and “C” as it describes a specific business strategy for East Kentucky Power Cooperative, Inc. (“EKPC”) and its member systems (one of which is Owen Electric), which could possibly give third parties an unfair competitive advantage if publicly disclosed. Additionally, as of the date of this

filing, the document contained as Exhibit "B" has not been ratified by all member systems' Boards of Directors.

3. Owen Electric requests that confidentiality be maintained through December 31, 2013, or until the Commission issues a final Order in this proceeding, whichever is earlier.
4. Along with this Motion, Owen Electric has enclosed one copy of Exhibits "B" and "C", with the confidential information identified by highlighting or other designation, and 10 copies of Exhibits "B" and "C", with the confidential information redacted. The identified confidential information is not known outside of EKPC, Owen Electric, and the 15 other member systems and is distributed within those companies only to persons with a need to use it for business purposes. It is entitled to confidential treatment pursuant to 807 KAR 5:001 Section 13 and KRS 61.878(1)(c) 2 c, as records generally recognized as confidential or proprietary which are confidentially disclosed to an agency in conjunction with the regulation of a commercial enterprise.

WHEREFORE, Owen Electric respectfully requests that the Commission grant confidential treatment to the identified information and deny public disclosure of said information.

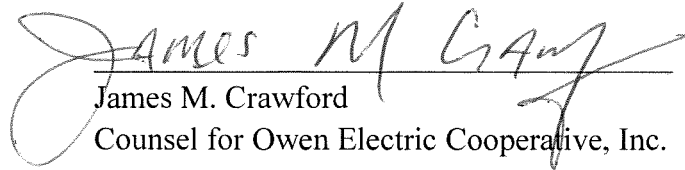
Respectfully submitted,



James M. Crawford
Counsel for Owen Electric Cooperative, Inc.
Crawford & Baxter, P.S.C.
P.O. Box 353
Carrollton, Kentucky 41008
Phone: (502) 732-6688
Fax: (502) 732-8303
CBJ523@aol.com

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served by mailing a true and correct copy, by first-class postage prepaid mail, to all parties on the 26th day of July, 2013.


James M. Crawford
Counsel for Owen Electric Cooperative, Inc.

Allen Anderson
President and CEO
South Kentucky R.E.C.C.
929 N. Main Street
P.O. Box 910
Somerset, KY 42502-0910

Anthony S. Campbell
President & CEO
East Kentucky Power Cooperative, Inc.
4775 Lexington Road
P.O. Box 707
Winchester, KY 40392-0707

Paul G. Embs
President & CEO
Clark Energy Cooperative, Inc.
2640 Ironworks Road
P.O. Box 748
Winchester, KY 40392-0748

David Estep
President & General Manager
Big Sandy R.E.C.C.
504 11th Street
Paintsville, KY 41240-1422

Carol Ann Fraley
President & CEO
Grayson R.E.C.C.
109 Bagby Park
Grayson, KY 41143

Ted Hampton
Manager
Cumberland Valley Electric, Inc.
Highway 25E
P.O. Box 440
Gray, KY 40734

Larry Hicks
President & CEO
Salt River Electric Cooperative Corp.
111 West Brashear Avenue
P.O. Box 609
Bardstown, KY 40004

Kerry K. Howard
CEO
Licking Valley R.E.C.C.
P.O. Box 605
271 Main Street
West Liberty, KY 41472

James L. Jacobus
President & CEO
Inter-County Energy Cooperative
Corporation
1009 Hustonville Road
P.O. Box 87
Danville, KY 40423-0087

Debbie J. Martin
President & CEO
Shelby Energy Cooperative, Inc.
620 Old Finchville Road
Shelbyville, KY 40065

Michael L. Miller
President & CEO
Nolin R.E.C.C.
411 Ring Road
Elizabeth, KY 42701-6767

Barry L. Myers
Manager
Taylor County R.E.C.C.
625 West Main Street
P.O. Box 100
Campbellsville, KY 42719

Christopher S. Perry
President & CEO
Fleming-Mason Energy Cooperative, Inc.
1449 Elizaville Road
P.O. Box 328
Flemingsburg, KY 41041

Bill Prather
President & CEO
Farmers R.E.C.C.
504 South Broadway
P.O. 1298
Glasgow, KY 42141-1298

Mark Stallons
President & CEO
Owen Electric Cooperative, Inc.
8205 Highway 127 North
P.O. Box 400
Owenton, KY 40359

Mike Williams
President & CEO
Bluegrass Energy Cooperative Corp.
1201 Lexington Road
P.O. Box 990
Nicholasville, KY 40340-0990

Carol Wright
President & CEO
Jackson Energy Cooperative, Corp
115 Jackson Energy Lane
McKee, KY 40447

Honorable W. Jeff Scott
Attorney At Law
P.O. Box 608
311 West Main Street
Grayson, KY 41143

**COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION**

In the Matter of:

PETITION AND COMPLAINT OF GRAYSON)	
RURAL ELECTRIC COOPERATIVE)	
CORPORATION FOR AN ORDER)	
AUTHORIZING PURCHASE OF ELECTRIC)	
POWER AT THE RATE OF SIX CENTS PER)	
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POWER COOPERATIVE UNDER A)	
WHOLESALE POWER CONTRACT AS)	
AMENDED BETWEEN GRAYSON RURAL)	
ELECTRIC COOPERATIVE CORPORATION)	
AND EAST KENTUCKY POWER)	
COOPERATIVE INC.)	

**MOTION FOR FULL INTERVENTION OF
OWEN ELECTRIC COOPERATIVE, INC.**

Pursuant to KRS 278.310 and 807 KAR 5:001, Section 4 (11), Owen Electric Cooperative, Inc. ("Owen Electric") respectfully requests that it be granted full intervenor status in the above-captioned proceeding and states in support thereof as follows:

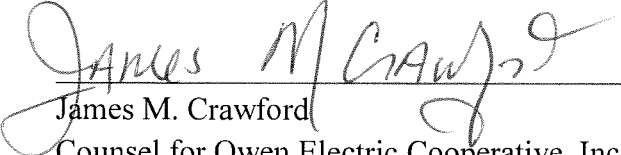
1. Owen Electric is engaged in the business of operating a retail electric distribution system in nine counties in northern Kentucky. Owen Electric's business address is 8205 Highway 127 North, Post Office Box 400, Owenton, Kentucky 40359-3036. Owen Electric is a member-owner of East Kentucky Power Cooperative, Inc. ("EKPC").

2. On November 19, 2012, Grayson Rural Electric Cooperative Corporation (“Grayson”), also a member-owner of EKPC, filed jointly a complaint against EKPC, and a petition requesting in total the issuance of eight declarations arising under: (a) a contract for Grayson to purchase up to 9.4 MW of power from Magnum Drilling of Ohio, Inc.; and (b) Amendment 3 of Grayson’s wholesale power contract with EKPC.
3. Owen Electric and Grayson represent two of 16 member-owners of EKPC.
4. While Owen Electric expresses no comment on Grayson’s proposed purchase power contract, Owen Electric may present issues or develop facts regarding Amendment 3 of the wholesale power contract with EKPC that would assist the Commission in fully considering this matter, without unduly complicating or disrupting the proceedings.
5. Pages 22 and 23 of the Commission’s Order in this proceeding dated July 17, 2013 state: “Because the issues raised by Grayson may implicate the rights of EKPC’s other 15 Members, the Commission will serve a copy of this Order on each Member and allow them to individually or jointly file by July 30, 2013 a request for intervention and a response to the issues of: (a) whether Amendment 3 expressly requires a methodology for Members to share the allocation of alternate power, and if not expressly required, should the Commission nonetheless impute such a methodology for the Members to share the allocation of alternative power under Amendment 3; and (b) the proper form of advance notice to EKPC for an alternative sourced power purchase.”
6. In accordance with paragraph 4 of the Commission’s Order dated July 17, 2013, Owen Electric further supports this Motion by responding to the issues described in paragraph 5 above as set forth in Exhibit “A” attached here to and incorporated herein.

WHEREFORE, Owen Electric Cooperative, Inc. respectfully requests that it be granted full intervenor status in the above-captioned proceeding.

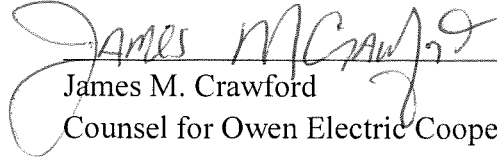
Dated at Owenton, Kentucky, this 26 of July 2013.

Respectfully submitted,


James M. Crawford
Counsel for Owen Electric Cooperative, Inc.
Crawford & Baxter, P.S.C.
P.O. Box 353
Carrollton, Kentucky 41008
Phone: (502) 732-6688
Fax: (502) 732-8303
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P.O. Box 910
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OWEN ELECTRIC COOPERATIVE, INC.
MOTION TO INTERVENE—RESPONSE
CASE NO. 2012-00503

1. Whether Amendment 3 expressly requires a methodology for Members to share the allocation of alternative power, and if not expressly required, should the Commission nonetheless impute such a methodology for the Members to share the allocation of alternative power under Amendment 3

Response: It is Owen Electric's position that Amendment 3 is silent in stating a methodology for Members to share the allocation of alternative power.

Since Amendment 3 does not expressly require an allocation methodology it is Owen Electric's position that the Commission should strongly encourage EKPC and its Members to agree on a methodology that is fair and equitable to all members. Fortunately, the Member CEO's have developed a document titled Memorandum of Understanding and Agreement "MOU&A" (attached hereto and incorporated herein as Exhibit "B"). The document has been approved by all sixteen (16) CEO's, a power point has been developed describing the major points of the MOU&A (attached hereto and incorporated herein as Exhibit "C"), and Eight (8) Member Board's have approved the MOU&A. On June 27, 2013, Owen Electric's Board of Directors did approve said MOU&A contingent upon all 16 Member Board & EKPC Board approval. It is Owen's position that said MOU&A is a fair and equitable method to allocate potential benefits of alternative power. As a last resort, if agreement could not be achieved by all parties involved, Owen would support the Commission imputing said methodology as described herein.

2. The proper form of advance notice to EKPC for an alternative sourced power purchase.

Response: The MOU&A attached hereto and incorporated herein as Exhibit "B" addresses the issue of proper advance notice and as such is supported by Owen Electric.

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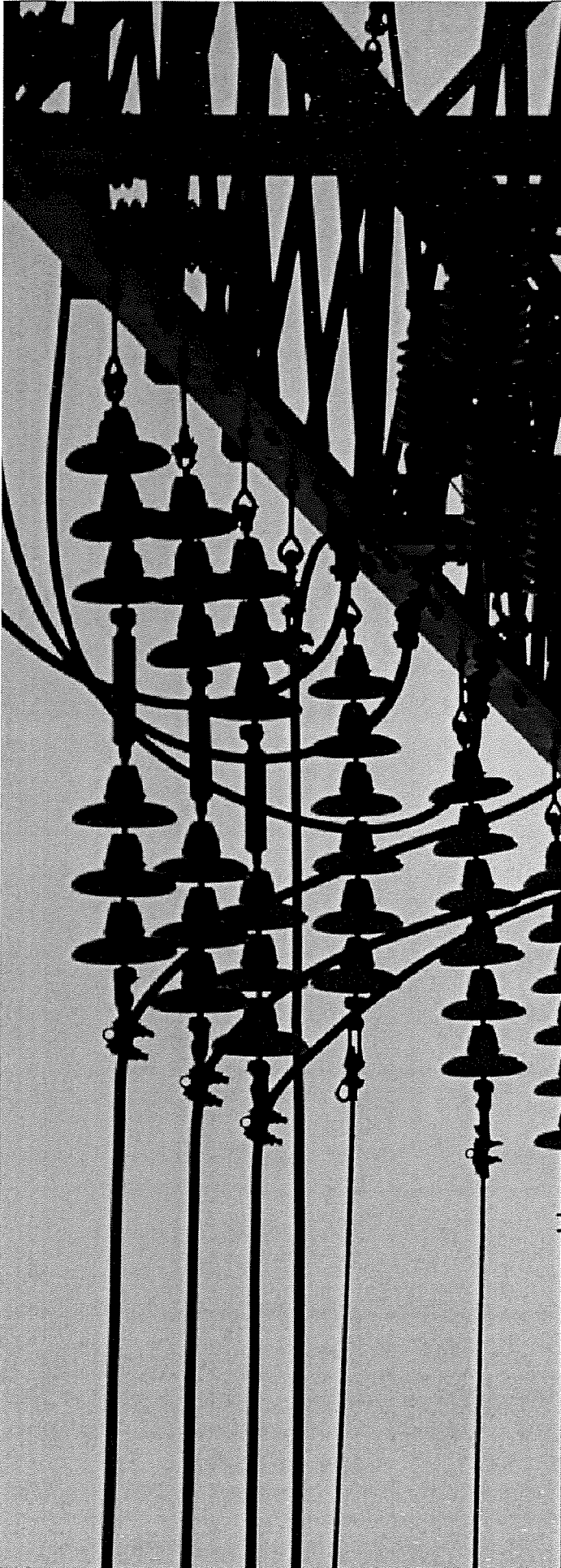
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Amendment 3 MOU&A

Exhibit C
Page 1 of 8
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EAST KENTUCKY POWER COOPERATIVE

A Touchstone Energy Cooperative



EAST KENTUCKY POWER COOP
A TACOMA Electric Cooperative



EAST KENTUCKY POWER CO-OP
A Trichone Energy Cooperative



EAST KENTUCKY POWER CO-OP
A Touchstone Energy Cooperative



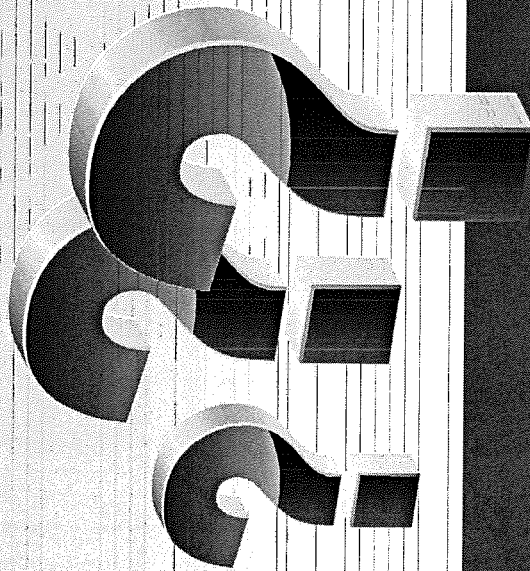
EAST KENTUCKY POWER CO.
A Tractone Energy Cooperative



EAST KENTUCKY POWER COOPERATIVE
A Touchstone Energy Cooperative



EAST KENTUCKY POWER COOP
A Toketonone Energy Cooperative



Questions and Discussion

