

# Goss • Samford PLLC



Attorneys at Law

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January 31, 2014

**RECEIVED**

FEB - 3 2014

PUBLIC SERVICE  
COMMISSION

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

Re: In the Matter of: Petition and Complaint of Grayson RECC 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 Killowatt Hour Purchased From East Kentucky Power Cooperative Under a Wholesale Power Contract as Amended Between Grayson RECC and East Kentucky Power Cooperative, Inc.  
PSC Case No. 2012-00503

Dear Mr. Derouen:

Enclosed please find for filing with the Commission in the above-referenced case an original and ten (10) copies of the Notice of Deposition of Greg Shepler and Subpoena Duces Tecum on behalf of East Kentucky Power Cooperative, Inc., South Kentucky Rural Electric Cooperative Corporation, Cumberland Valley Electric, Inc., Farmers Rural Electric Cooperative Corporation, Blue Grass Energy Corporation, Big Sandy Rural Electric Cooperative Corporation, Licking Valley Rural Electric Cooperative Corporation, Inter-County Energy Cooperative Corporation, Nolin Rural Electric Cooperative Corporation and Clark Energy Cooperative, Inc. to Grayson Rural Electric Cooperative Corporation. Please return a file-stamped copy to me in the enclosed self-addressed, stamped envelope.

Do not hesitate to contact me if you have any questions.

Sincerely,

David S. Samford

Enclosures

M:\Clients\4000 - East Kentucky Power\1800 - Grayson Litigation\  
Correspondence\Ltr. to Jeff Derouen (2012-00503) - 140131

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

**RECEIVED**

FEB - 3 <sup>2014</sup> ~~2013~~

**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 ) CASE NO. 2012-00503  
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. )

**NOTICE OF DEPOSITION OF GREG SHEPLER**  
**AND SUBPOENA DUCES TECUM**

Come now the Defendants, East Kentucky Power Cooperative, Inc., Charleston Bottoms Rural Electric Cooperative Corporation, Big Sandy Rural Electric Cooperative Corporation, Blue Grass Energy, Clark Energy, Cumberland Valley Electric, Farmers Rural Electric Cooperative Corporation, Licking Valley Rural Electric Cooperative Corporation, Nolin Rural Electric Cooperative Corporation, Shelby Energy Cooperative, and South Kentucky Rural Electric Cooperative Corporation, by and through counsel, pursuant to CR 30 and other applicable law, and do hereby give notice that GREG SHEPLER, of EnerVision, Inc., shall appear and be deposed beginning at 2:00 p.m. on Tuesday, February 25, 2014 at the offices of the Grayson Rural Electric Cooperative Corporation, 109 Bagby Park, Grayson, Kentucky 41143.

The deponent is directed to appear at the deposition with all notes, reports, workpapers, correspondence, emails and any other documents which were generated or used in relation to any analyses which he performed for Grayson Rural Electric Cooperative Corporation related to purchase power agreements, market purchases or similar projects involving the purchase of power from an entity other than East Kentucky Power Cooperative, Inc. This deposition shall continue from day to day until its completion.

This 31st day of January, 2014.

Respectfully submitted,



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Lexington, Kentucky 40504  
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*Counsel for Defendants, East Kentucky Power Cooperative, Inc., Charleston Bottoms Rural Electric Cooperative Corporation, Big Sandy Rural Electric Cooperative Corporation, Blue Grass Energy, Clark Energy, Cumberland Valley Electric, Farmers Rural Electric Cooperative Corporation, Licking Valley Rural Electric Cooperative Corporation, Nolin Rural Electric Cooperative Corporation, Shelby Energy Cooperative, and South Kentucky Rural Electric Cooperative Corporation*

**CERTIFICATE OF SERVICE**

This is to certify that a true and correct copy of the foregoing was served by depositing same into the custody and care of the U.S. Postal Service, postage pre-paid, on this the 31<sup>st</sup> day of January, 2014, addressed to the following individuals:

W. Jeffrey Scott, Esq.  
W. Jeffrey Scott, P.S.C.  
P. O. Box 608  
Grayson, Kentucky 41143

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Mathis, Riggs & Prather, P.S.C.  
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Shelbyville, KY 40065

Clayton O. Oswald  
Taylor, Keller & Oswald, PLLC  
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London, KY 40743-003440

Taylor County RECC  
625 West Main Street  
P. O. Box 100  
Campbellsville, KY 42719

James M. Crawford  
Crawford & Baxter, PSC  
523 Highland Avenue  
P. O. Box 353  
Carrollton, KY 41008

Salt River Electric Cooperative Corp.  
111 West Brashear Avenue  
P. O. Box 609  
Bardstown, KY 40004-0609



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*Counsel for Defendants, East Kentucky Power Cooperative, Inc., Charleston Bottoms Rural Electric Cooperative Corporation, Big Sandy Rural Electric Cooperative Corporation, Blue Grass Energy, Clark Energy, Cumberland Valley Electric, Farmers Rural Electric Cooperative Corporation, Licking Valley Rural Electric Cooperative Corporation, Nolin Rural Electric Cooperative Corporation, Shelby Energy Cooperative, and South Kentucky Rural Electric Cooperative Corporation*