

COMMONWEALTH OF KENTUCKY
KENTUCKY PUBLIC SERVICE COMMISSION

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JUN 18 2015

PUBLIC SERVICE
COMMISSION

In the Matter of:

PETITION AND COMPLAINT OF GRAYSON)
RURAL ELECTRIC COOPERATIVE)
CORPORATION FOR A DECLARATION OF)
ITS EXCLUSIVE RIGHT PURSUANT TO)
KRS 278.018(1) TO SERVE THOSE PORTIONS)
OF THE VALLEY VIEW SUBDIVISION IN CARTER)
COUNTY, KENTUCKY LYING WITHIN ITS)
CERTIFIED TERRITORY IN LIEU OF KENTUCKY)
POWER COMPANY)

CASE NO.

2015-00131

**RESPONSE OF GRAYSON RURAL ELECTRIC COOPERATIVE CORPORATION
(HEREINAFTER GRAYSON) TO THE COMMISSION'S DATA REQUEST SET
FORTH IN THE ORDER OF JUNE 4, 2015**

Comes now Grayson and for its response to the data request of the Commission in the Order of June 4, 2015, states as follows:

1. Attached hereto is a certified territory map showing the boundary line delineating the service territories of Grayson and Kentucky Power. This is marked as Exhibit "1".
2. A Google Earth map showing the street addresses of the residences and electric consuming facilities in the Valley View Subdivision that Grayson alleges are within its service territory but are receiving electric service from Kentucky Power. This is marked as Exhibit "2".
3. A four page, front and back, denoted as "Staking Sheet for Job 47158" which contains the result of a survey performed by Grayson employee, Scott Speaks, setting forth the addresses referenced in Exhibit "2" and the exact GPS location of the residences and electric consuming facilities that Grayson alleges are within its territory but served by Kentucky Power. This is marked as Exhibit "3".

4. A copy of a Google Earth topographical map showing a copy of push pins placed thereon at the location set forth in the GPS locations in Exhibit "3" which place those locations within the service territory of Grayson but served by Kentucky Power.
5. Grayson respectfully submits that the foregoing and the referenced attachments hereto constitute compliance with the Order of June 4, 2015.

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 has been served upon the parties by mailing a true and correct copy of same to:

Hon. Mark R. Overstreet
Hon. R. Benjamin Crittenden
Stites & Harbison, PLLC
421 West Main Street
P.O. Box 634
Frankfort, KY 40602-0634
Counsel for Kentucky Power Company

This is to further certify that the original plus 9 copies 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 17th day of June, 2015.

W. Jeffrey Scott
Attorney for GRECC

2015-00131

CONTAINS

LARGE OR OVERSIZED

MAP(S)

RECEIVED ON:

June 18th, 2015