

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)
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.)

CASE NO.
2012-00503

NOTICE OF FILING

Notice is hereby given that Grayson Rural Electric Cooperative Corporation hereby gives notice of the filing of the original of Request for Documents served upon the Intervening Distribution Cooperatives in the within action. These Interrogatories were served on October 2, 2013.

RESPECTFULLY SUBMITTED,

W. JEFFREY SCOTT, P.S.C.

BY: 

W. JEFFREY SCOTT
BRANDON M. MUSIC
ATTORNEYS FOR PETITIONER
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 David Goss
Hon. David S. Samford
Goss & Samford, PLLC
2365 Harrodsburg Road – Suite B 325
Lexington, KY 40504

Hon. Clayton O. Oswald
Taylor, Keller & Oswald, PLLC
P.O. Box 3440
1306 West Fifth Street – Suite 100
London, KY 40743-03440

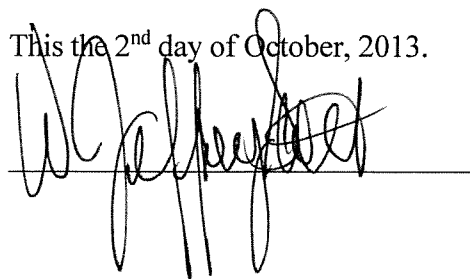
Hon. James M. Crawford
Crawford & Baxter
523 Highland Avenue
P.O. Box 353
Carrollton, KY 41008

Hon. Don Prather
Mathis, Riggs & Prather, P.S.C.
500 Main Street - Suite 5
Shelbyville, KY 40065

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 2nd day of October, 2013.

A handwritten signature in black ink, appearing to read "Don Prather", is written over a horizontal line. The signature is cursive and somewhat stylized.

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**DOCUMENT REQUEST OF PETITIONER TO ALL
INTERVENING DISTRIBUTION COOPERATIVE RESPONDENTS**

Comes now Grayson Rural Electric Cooperative Corporation (GRECC) and herewith submits the following document request to each of the Intervening Distribution Cooperatives in the within action and East Kentucky Power Cooperative, Inc. These documents should be supplied to counsel for the Petitioner, Hon. W. Jeffrey Scott, at his address of 311 West Main Street, Grayson, Kentucky, 41143, no later than October 23, 2013, at the hour of 4:00 p.m. or at such other time as may be designated by an appropriate Order of the Kentucky Public Service Commission.

REQUEST NO. 1: Please set forth a copy of any and all documents or agreements between any of the distribution cooperatives and East Kentucky Power Cooperative concerning the use of common, legal representation in the within action.

REQUEST NO. 2: Please provide copies of any and all documents evidencing notice sent to or received by East Kentucky Power Cooperative, regarding a distribution cooperative's purchase or

use of power from a source other than East Kentucky Power Cooperative, Inc., by any of the distribution cooperatives as well as any other.

REQUEST NO. 3: Please set forth any other document concerning the purchase or use of power by any distribution cooperative from a source other than East Kentucky Power either in utilization at the present time or contemplated in the future, that has been authorized by a distributions co-op's Board as a result of any board action authorizing same.

REQUEST NO. 4: Please provide copies of any and all documents evidencing the extent of the electric power purchase or use from a source other than East Kentucky Power by any distribution cooperative.

REQUEST NO. 5: Please provide a copy of any document which any distribution cooperative herein or East Kentucky Power Cooperative intends to use at the Final Hearing in the within action, as well as the name, address and title of the person intending to offer said document into evidence.

REQUEST NO. 6: With respect to East Kentucky Power Cooperative only, please provide copies of any and all documents evidencing any internal audit, investigation, analysis, study, or any other undertaking evidencing the effect of Grayson Rural Electric Cooperative Corporation upon East Kentucky Power Cooperative's financial status should Grayson Rural Electric Cooperative Corporation purchase 9.3 megawatts of power from a source other than East Kentucky Power Cooperative.

REQUEST NO. 7: Please set forth any and all documents evidencing the power purchased by East Kentucky Power from sources other than its own generating plants within the last eighteen months.

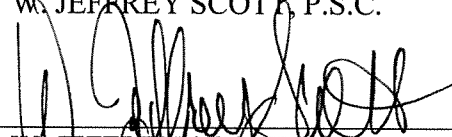
REQUEST NO. 8: Please provide copies of any and all documents evidencing East Kentucky Power's request for proposals for the sale of power to East Kentucky Power within the last eighteen months.

REQUEST NO. 9: With respect to East Kentucky Power Cooperative, please set forth any and all documents evidencing the agreement, if any there be, between East Kentucky Power Cooperative and any distribution cooperative concerning the sale of power to any distribution cooperative for an amount of money less than that which is charged or exacted from any other distribution cooperative.

RESPECTFULLY SUBMITTED,

W. JEFFREY SCOTT, P.S.C.

BY:


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BRANDON M. MUSIC
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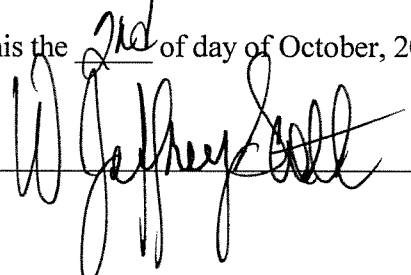
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