

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

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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

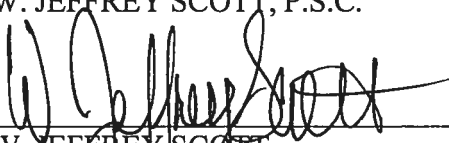
NOTICE OF FILING

Notice is hereby given that Grayson Rural Electric Cooperative Corporation hereby gives notice of the filing of the original of Interrogatories 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

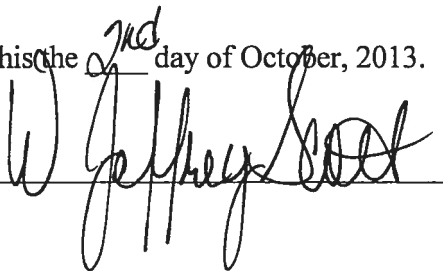
Hon. James M. Crawford
Crawford & Baxter
523 Highland Avenue
P.O. Box 353
Carrollton, KY 41008

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.



W. Jeffrey Scott

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

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ELECTRIC COOPERATIVE CORPORATION AND)
EAST KENTUCKY POWER COOPERATIVE,)
INC.)

**INTERROGATORIES OF PETITIONER TO ALL
INTERVENING DISTRIBUTION COOPERATIVE RESPONDENTS**

Comes now Grayson Rural Electric Cooperative Corporation (GRECC) and herewith submits the following Interrogatories to the Intervening Distribution Cooperative Respondents. These Interrogatories should be answered under oath by a duly authorized representative of the answerer. Said answer should be served upon the undersigned counsel for Petitioner, GRECC, 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.

INTERROGATORY NO. 1: Please state the name, address and title of the person answering these Interrogatories.

INTERROGATORY NO. 2: With respect to each distribution cooperative, please set forth what load or loads any said distribution cooperative has served on its system from a source other than

East Kentucky Power Cooperative including the total megawatts utilized and the date of when said load or loads was commenced.

INTERROGATORY NO. 3: Please set forth the date upon which any notice of service of any load or notice of the utilization of any power outside that purchased from East Kentucky Power Cooperative was sent to East Kentucky Power Cooperative.

INTERROGATORY NO. 4: Please state whether any distribution co-op received any responses to any of its notices sent to East Kentucky Power Cooperative, and if so, the nature and content of each said response.

INTERROGATORY NO. 5: Please set forth any power amount or loads each distribution co-op desires to have served outside of East Kentucky Power Cooperative or by action of its Board of Directors has sought and with respect to same, please state whether notice of same has been sent to East Kentucky Power Cooperative, Inc.

INTERROGATORY NO. 6: With respect to each distribution cooperative, please set forth the coincident peak demand over the preceding thirty-six (36) months of its load.

INTERROGATORY NO. 7: Please set forth the terms and conditions of any agreement between any distribution cooperative and East Kentucky Power concerning payment for legal expenses by East Kentucky Power for any distribution cooperative that has entered its appearance in the within proceeding, as well as setting forth all monies paid by East Kentucky Power Cooperative for legal expenses for any distribution co-op in the within proceeding.

INTERROGATORY NO. 8: Please set forth with respect to any distribution co-op intervening in the within proceeding the nature and term of any agreement between said distribution co-op and East Kentucky Power Cooperative concerning payment of costs for wholesale power, anything of value given or received by either party, i.e., the distribution co-op or East Kentucky Power

Cooperative concerning the issues raised in the within proceeding, or anything of value for any load to be served by any entity on the distribution co-op's lines, i.e., any concession or disparity in rates charged by East Kentucky Power Cooperative for any particular load such as any industrial customer or otherwise.

INTERROGATORY NO. 9: Please state whether any of the distribution co-ops intervening in the within action believe that the purchase of power by it from a source other than East Kentucky Power Cooperative of up to 15% of its load, at any rate less than that which is currently being paid to East Kentucky Power, would be beneficial to the members of said distribution co-op.

INTERROGATORY NO. 10: If your answer to the proceeding Interrogatory is in the negative, then please set forth the factual basis upon which you claim that your members paying less for electric power is not in their best interest.

INTERROGATORY NO. 11: Please set forth the name, address and title of each person which any distribution co-op intends to call as a witness at the Final Hearing in the within action setting forth the factual basis upon which each said witness is expected to testify, as well as a summary of the grounds for each opinion.

INTERROGATORY NO. 12: Please set forth the name, address, title and educational background and qualifications of any expert witness which any distribution cooperative intends to call at the Final Hearing in this action, as well as setting forth the substance of the facts and opinions to which the expert is expected to testify, as well as the basis for each said opinion and a summary of each opinion.

INTERROGATORY NO. 13: Please state whether any of the distribution cooperatives intervening in the within action believe that there is an inherent conflict of interest with the same attorney or attorneys representing East Kentucky Power in the within proceeding, and the same

attorney or attorneys representing the distribution cooperatives in the within proceeding, inasmuch as the basis for the complaint filed by the Petitioner is to obtain authorization for payment of wholesale power rates to East Kentucky Power by all of the distribution cooperatives less than the current rate, and as such, result in reduced costs to the members of each distribution cooperative and a reduction in equity to East Kentucky Power Cooperative.

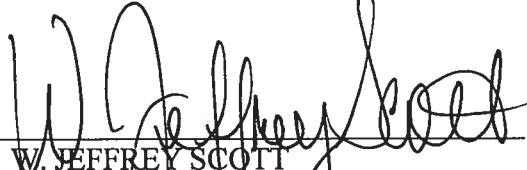
INTERROGATORY NO. 14: If the answer to the proceeding Interrogatory is in the negative then please set forth the factual basis for the apparent contradictory answer on same.

INTERROGATORY NO. 15: Please set forth the language of any waiver of any conflict of interest any distribution cooperative has signed that is connected to or is related to the representation it has in this case.

RESPECTFULLY SUBMITTED,

W. JEFFREY SCOTT, P.S.C.

BY:


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BRANDON M. MUSIC
ATTORNEYS FOR PETITIONER
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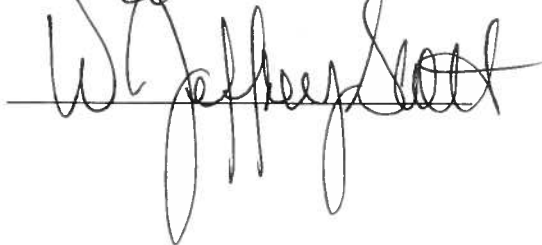
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This the 2nd day of October, 2013.



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