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October 22, 2013

**RECEIVED**

**OCT 24 2013**

**PUBLIC SERVICE  
COMMISSION**

Mr. Jeff Derouen, Executive Director  
Kentucky Public Service Commission  
211 Sower Boulevard  
P.O. Box 615  
Frankfort, Kentucky 40602-0615

**RE: Owen Electric Cooperative, Inc./Fleming-Mason Electric Cooperative  
PSC Case No. 2012-00503**

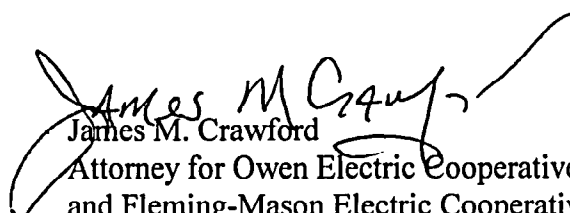
Dear Mr. Derouen:

Please find enclosed the original and ten (10) copies of the responses of Owen Electric Cooperative, Inc., and Fleming-Mason Electric Cooperative's Responses to Grayson's Requests for Documents.

Please contact me with any questions regarding this filing.

Respectfully yours,

CRAWFORD & BAXTER, P.S.C.

  
James M. Crawford  
Attorney for Owen Electric Cooperative, Inc.  
and Fleming-Mason Electric Cooperative

JMC/mns

Enclosures

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

RECEIVED

OCT 24 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 )  
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

**OWEN ELECTRIC COOPERATIVE, INC'S AND  
FLEMING-MASON ENERGY COOPERATIVE  
RESPONSES TO DOCUMENT REQUEST OF PETITIONER**

Come now Owen Electric Cooperative, Inc., and Fleming-Mason Energy Cooperative, and  
for their Responses to Grayson's Requests for Documents, state as follows:

**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.

RESPONSE: None.

**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.

RESPONSE: None.

CRAWFORD & BAXTER, P.S.C.  
ATTORNEYS-AT-LAW  
CARROLLTON, KY

**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.

RESPONSE: None

**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.

RESPONSE: See Response to No. 3.

**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.

RESPONSE: Not yet determined.

**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.

RESPONSE: N/A

**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.

RESPONSE: N/A

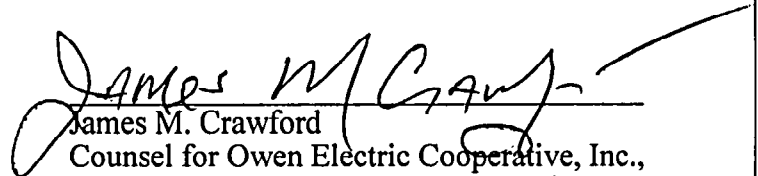
**REQUEST NO. 8:** Please provide copies of any and ail documents evidencing East Kentucky Power's request for proposals for the sale of power to East Kentucky Power within the last eighteen months.

RESPONSE: N/A

**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.

RESPONSE: N/A

Respectfully submitted,



James M. Crawford  
Counsel for Owen Electric Cooperative, Inc.,  
and Fleming-Mason Energy Cooperative  
and co-counsel with Hon. Marvin Suit for  
Fleming-Mason Energy Cooperative  
Crawford & Baxter, P.S.C.  
P.O. Box 353  
Carrollton, Kentucky 41008  
Phone: (502) 732-6688  
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[CBJ523@aol.com](mailto:CBJ523@aol.com)  
Hon. Marvin Suit  
207 Court Square  
Fleming, Kentucky 41041

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 22<sup>nd</sup> day of October, 2013, to:

W. JEFFREY SCOTT, P.S.C.  
ATTN: Hon. Jeffrey Scott  
Hon. Brandon M. Music  
311 West Main Street  
P.O. Box 608  
Grayson, KY 41143

GOSS & SAMFORD, PLLC  
ATTN: Hon. Mark David Goss  
Hon. David S. Samford  
2365 Harrodsburg Road, Suite B325  
Lexington, Kentucky 40504

TAYLOR, KELLER & OSWALD, PLLC  
ATTN: Hon. Clayton O. Oswald  
P.O. Box 3440  
1306 West Fifth Street, Suite 100  
London, Kentucky 40743

MATHIS, RIGGS & PRATHER, P.S.C.  
ATTN: Hon. Don Prather  
500 Main Street, Suite 5  
Shelbyville, Kentucky 40065

This is to further certify that the original of  
this document has been forwarded to the  
Kentucky Public Service Commission as  
follows:

Kentucky Public Service Commission  
P.O. Box 615  
Frankfort, Kentucky 40602-0615

BY:   
James M. Crawford