

# Goss • Samford PLLC



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October 25, 2013

*Via Hand-Delivery*

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

**RECEIVED**

**OCT 25 2013**

**PUBLIC SERVICE  
COMMISSION**

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 each of the Responses to Grayson Rural Electric Cooperative Corporation's Document Requests to All Intervening Distribution Cooperative Respondents and Answers to Grayson Rural Electric Cooperative Corporation's Interrogatories to All Intervening Distribution Cooperative Respondents on behalf of the following cooperatives:

1. Blue Grass Energy Corporation;
2. Clark Energy Cooperative, Inc.;
3. South Kentucky Rural Electric Cooperative Corporation;
4. Cumberland Valley Electric, Inc.;
5. Licking Valley Rural Electric Cooperative Corporation;
6. Inter-County Energy Cooperative Corporation;
7. Big Sandy Rural Electric Cooperative Corporation; and
8. Nolin Rural Electric Cooperative Corporation.

Please return file-stamped copies to me. Do not hesitate to contact me if you have any questions.

Very truly yours,

David S. Samford

Enclosures

CC: Counsel of Record

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

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OCT 25 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 )
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

SOUTH KENTUCKY RURAL ELECTRIC COOPERATIVE CORPORATION'S
RESPONSES TO GRAYSON RURAL ELECTRIC COOPERATIVE
CORPORATION'S DOCUMENT REQUEST TO ALL
INTERVENING DISTRIBUTION COOPERATIVE RESPONDENTS

Comes now South Kentucky Rural Electric Cooperative Corporation ("SKRECC"), by
counsel, and hereby responds as follows to the Document Request propounded by the Petitioner,
Grayson Rural Electric Cooperative Corporation ("Grayson"), to All Intervening Distribution
Cooperative Respondents:

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: SKRECC objects to this request on the basis that it seeks documents which
are privileged. Moreover, the documents requested are not relevant to the Public Service

Commission's determination of the appropriate interpretation and implementation of Amendment 3 to the Wholesale Power Contract.

**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:** SKRECC has no documents that are responsive to this request. Please see the response to Grayson's Interrogatory Nos. 2 and 3 for additional information.

**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:** SKRECC has no documents that are responsive to this request. SKRECC purchases all of its power from East Kentucky Power Cooperative, Inc. ("EKPC"). While SKRECC does have some members who use self-generated power in a net-metering arrangement, it does not use any power from a non-EKPC resource.

**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 the response to the above request.

**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:** SKRECC has not made a determination at this time and is unable to provide any documents in response to this request.

**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:** SKRECC has no documents responsive to this request.

**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:** SKRECC has no documents responsive to this request.

**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.

**RESPONSE:** SKRECC has no documents responsive to this request.

**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:** SKRECC has no documents responsive to this request.

**VERIFICATION**

By signing below, the individual answering these Requests for Production, on behalf of South Kentucky Rural Electric Cooperative Corporation, hereby certifies that the foregoing responses are true and correct to the best of his knowledge and belief.

SOUTH KENTUCKY RURAL ELECTRIC  
COOPERATIVE CORPORATION

*Allen Anderson*

By:

Allen Anderson, President and CEO

COMMONWEALTH OF KENTUCKY    )  
COUNTY OF PULASKI            )

Acknowledged, subscribed and sworn to before me by Allen Anderson on behalf of South Kentucky Rural Electric Cooperative Corporation, this 23<sup>rd</sup> day of October, 2013.

*Army G. Gester*

Notary Public, # 422172

My Commission Expires: June 23, 2014

For the Objections,

*Mark David Goss*

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David S. Samford  
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