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October 28, 2013

RECEIVED

OCT 29 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**

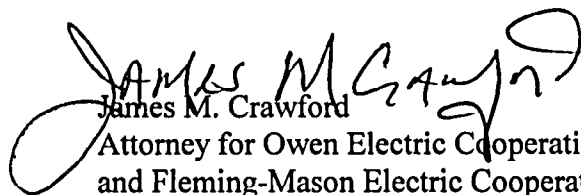
Dear Mr. Derouen:

Please find enclosed the original and ten (10) copies of Owen Electric Cooperative, Inc., and Fleming-Mason Electric Cooperative's Answers to Grayson's Interrogatories to All Intervening Distribution Cooperative Respondents.

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 29 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
ANSWERS TO INTERROGATORIES OF PETITIONER**

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

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

ANSWER: James M. Crawford, P.O. Box 353, Carrollton, Kentucky 41008; attorney for Owen Electric Cooperative and Fleming-Mason Energy Cooperative.

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.

ANSWER: None.

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.

ANSWER: See Answer to Interrogatory No. 2.

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.

ANSWER: See Response to Interrogatory No. 2.

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.

ANSWER: Owen Electric Cooperative, Inc., and Fleming-Mason Energy Cooperative are exploring various options for the purchase of power from a non-EKPC resource. However, neither coop has made any firm decision in regard to same and cannot do so until the Amendment 3 issue is resolved.

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.

ANSWER: This information is being compiled and will be provided by supplemental answer to interrogatories.

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.

ANSWER: Not applicable to either Owen Electric Cooperative or Fleming-Mason Energy Cooperative as both coops are paying for their own legal representation.

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.

ANSWER: Owen Electric Cooperative and Fleming-Mason Energy Cooperative purchase wholesale power from EKPC pursuant to the Wholesale Power Contract and EKPC's tariffs and special contracts that have been approved by the Kentucky Public Service Commission.

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.

ANSWER: This Interrogatory cannot be answered until the Amendment 3 issue has been resolved by the Public Service Commission or all 16 coops and EKPC agree to and approve the memorandum of understanding. Once that occurs, a proper evaluation of purchasing power from a source other than EKPC can be conducted and this interrogatory can be answered.

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.

ANSWER: See Answer to Interrogatory No. 9.

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.

ANSWER: Not yet determined.

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.

ANSWER: Not yet determined.

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.

ANSWER: Owen Electric Cooperative and Fleming-Mason Energy Cooperative object to this interrogatory as it seeks information that is privileged, confidential and of no relevance to this proceeding.

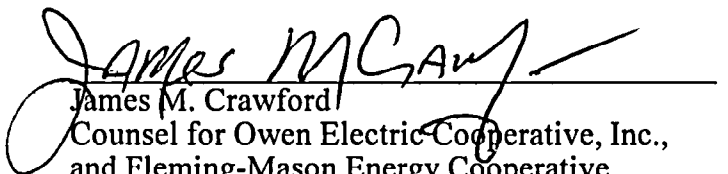
INTERROGATORY NO. 14: If the answer to the proceeding Interrogatory is in the negative, then please set forth the factual basis for the apparent contradictory answer on same.

ANSWER: See Answer to Interrogatory No. 13 above.

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.

ANSWER: Not applicable to either Owen Electric Cooperative or Fleming-Mason Energy Cooperative.

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

and
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 28th 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

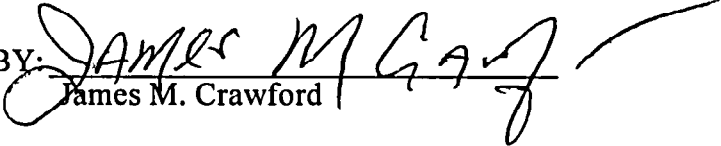
TAYLOR, KELLER & OSWALD, PLLC
ATTN: Hon. Clayton O. Oswald
P.O. Box 3440
1306 West Fifth Street, Suite 100
London, Kentucky 40743

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