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October 29, 2013

RECEIVED

OCT 31 2013

PUBLIC SERVICE
COMMISSION

Mr. Jeff Derouen
Executive Director
Public Service Commission
211 Sower Boulevard
Frankfort, Kentucky 40602

Re: Shelby Energy Cooperative PSC Case No. 2012-00503

Dear Mr. Derouen:

Please find enclosed for filing with the Commission in the above-referenced case an original and ten copies of Shelby Energy Cooperative, Inc.'s Answers to Grayson Rural Electric Cooperative Corporation's Interrogatories to All Intervening Cooperative Respondents, and Shelby Energy Cooperative, Inc.'s Responses to Grayson Rural Electric Cooperative Corporation's Document Requests to All Intervening Cooperative Respondents.

Thank you for your attention to this matter.

Very truly yours,

MATHIS, RIGGS & PRATHER, P.S.C.

By: Donald T. Prather
Donald T. Prather

By Paul McElain

DTP/pm
Enclosures

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

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OCT 31 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 OF POWER VS A RATE IN EXCESS OF SEVEN CENTS PER KILOWATT HOUR PURCHASED FROM EAST KENTUCKY POWER COOPERATIVE UNDER A WHOLESALE CONTRACT AS AMENDED BETWEEN GRAYSON RURAL ELECTRIC COOPERATIVE CORPORATION AND EAST KENTUCKY POWER COOPERATIVE, INC.

CASE NO. 2012-00503

SHELBY ENERGY COOPERATIVE, INC.'S
RESPONSES TO GRAYSON RURAL ELECTRIC COOPERATIVE CORPORATION'S
DOCUMENT REQUESTS TO ALL INTERVENING COOPERATIVE RESPONDENTS

Comes Shelby Energy Cooperative, Inc. ("SEC"), by counsel, and for its Responses to Grayson Rural Electric Cooperative Corporation's ("Grayson") Document Requests to all Intervening Cooperative Respondents states 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: No such documents or agreement exists between East Kentucky Power Cooperative, Inc. ("EKPC") and Shelby Energy Cooperative, Inc. ("SEC").

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: SEC has not sent to or received from EKPC any such notice.

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: SEC has not authorized any such document or action.

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: SEC does not at the present time purchase or use electric power from any source other than EKPC.

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: SEC has not made that decision.

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: The wording of this request indicates it is to be answered by EKPC, not SEC.

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: SEC objects to this Request as unreasonably burdensome on SEC. Any information in SEC's possession would have

been obtained through SEC's EKPC director and would have been provided to Grayson's EKPC director as well and should therefore be in Grayson's possession. EKPC is the best party to answer 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.

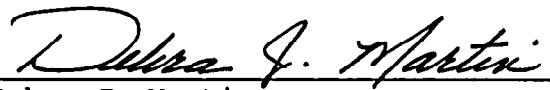
RESPONSE: SEC objects to this Request as unreasonably burdensome on SEC. Any information in SEC's possession would have been obtained through SEC's EKPC director and would have been provided to Grayson's EKPC director as well and should therefore be in Grayson's possession. EKPC is the best party to answer 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: The wording of this request indicates it is to be answered by EKPC, not SEC. However, SEC does not have any

documents concerning the sale of power by EKPC to SEC at any rates other than those approved by the PSC which are available to all distribution cooperatives.

I, Debra J. Martin, affirm that the preceding answers are true to the best of my information, knowledge and belief.


Debra J. Martin

Respectfully submitted,



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CERTIFICATE OF SERVICE

I, Donald T. Prather, certify that on October 29, 2013 copies of the foregoing were mailed to:

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