

# Goss ■ Samford PLLC



Attorneys at Law

**Mark David Goss**  
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(859) 368-7740

December 4, 2013

**RECEIVED**

**DEC - 6 2013**

**PUBLIC SERVICE  
COMMISSION**

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

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 East Kentucky Power Cooperative, Inc.'s Notices of Deposition for Carol Fraley, Don Combs, Jimmy Whitt, William Rice, Kenneth Arrington, Harold Dupuy and Bryan Poling. Please return file-stamped copies to me in the enclosed self-addressed, stamped envelope.

Do not hesitate to contact me if you have any questions.

Very truly yours,

Mark David Goss

Enclosures

M:\Clients\4000 - East Kentucky Power\1800 - Grayson Litigation\  
Correspondence\Ltr. to Jeff Derouen (2012-00503) - 131204

**COMMONWEALTH OF KENTUCKY**  
**BEFORE THE PUBLIC SERVICE COMMISSION**

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DEC - 6 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 ) CASE NO. 2012-00503  
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. )

**NOTICE OF DEPOSITION OF CAROL HALL FRALEY**

Comes now the Defendant, East Kentucky Power Cooperative, Inc., by and through counsel, pursuant to CR 30 and other applicable law, and does hereby give notice that CAROL HALL FRALEY, the President and Chief Executive Officer of Grayson Rural Electric Cooperative Corporation, residing at 35 Darby Hollow, Grayson, Kentucky, 41143, shall appear and be deposed beginning at 10:00 a.m. on Monday, January 6, 2014 at the offices of the Grayson Rural Electric Cooperative Corporation, 109 Bagby Park, Grayson, Kentucky 41143.

This deposition shall continue from day to day until its completion.

This 4th day of December, 2013.

Respectfully submitted,



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*Counsel for East Kentucky Power  
Cooperative, Inc.*

### **CERTIFICATE OF SERVICE**

This is to certify that a true and correct copy of the foregoing was served by depositing same into the custody and care of the U.S. Postal Service, postage pre-paid, on this the 4<sup>th</sup> day of December, 2013, addressed to the following individuals:

W. Jeffrey Scott, Esq.  
W. Jeffrey Scott, P.S.C.  
P. O. Box 608  
Grayson, Kentucky 41143


Don Prather  
Mathis, Riggs & Prather, P.S.C.  
500 Main Street, Suite 5  
Shelbyville, KY 40065

Clayton O. Oswald  
Taylor, Keller & Oswald, PLLC  
P.O. Box 3440  
1306 West Fifth Street, Suite 100  
London, KY 40743-003440

Taylor County RECC  
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Campbellsville, KY 42719

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

Salt River Electric Cooperative Corp.  
111 West Brashear Avenue  
P. O. Box 609  
Bardstown, KY 40004-0609



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*Counsel for East Kentucky Power Cooperative, Inc.*