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April 10, 2015

**RECEIVED**

APR 13 2015

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 Response to Grayson Rural Electric Cooperative Corporation's Motion for Hearing.

Thank you for your attention to this matter.

Very truly yours,

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

By: Donald T. Prather  
Donald T. Prather

By Paula McElwain

DTP/pm  
Enclosures

RECEIVED

APR 13 2015

PUBLIC SERVICE  
COMMISSION

COMMONWEALTH OF KENTUCKY

BEFORE THE 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.

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CASE NO. 2012-00503

**SHELBY ENERGY COOPERATIVE, INC.'S RESPONSE TO  
GRAYSON RURAL ELECTRIC COOPERATIVE CORPORATION'S  
MOTION FOR HEARING**

Comes Shelby Energy Cooperative, Inc. ("Shelby Energy"), by counsel, to conditionally oppose the motion of Grayson Rural Electric Cooperative Corporation ("Grayson") for a final hearing on the merits of this case. The basis for Shelby Energy's objection is that there are two motions pending before the Public Service Commission ("PSC") which must be ruled upon before a hearing in this case can occur.

The first motion was filed by Grayson in September of 2013 seeking to amend its Complaint. This motion was opposed by both East Kentucky Power Cooperative, Inc. and Shelby Energy. Grayson's motion has never been ruled upon by the PSC.

The second pending motion was filed by Shelby Energy in October of 2013. That motion sought an order from the PSC narrowing the scope of this case to solely a review of the issues presented by Amendment 3 and to dismiss all aspects of the case relating to Grayson's now-abandoned contract with Magnum and its attempted contract with Duke Energy. Grayson opposed Shelby Energy's motion.

WHEREFORE, Shelby Energy Cooperative, Inc. respectfully requests that Grayson's for a hearing be denied until the PSC rules on the two aforementioned pending motions.

Dated at Shelbyville, Kentucky this 10<sup>th</sup> day of April, 2015.

Respectfully submitted,



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Attorney for Shelby Energy Cooperative, Inc.

CERTIFICATE OF SERVICE

I, Donald T. Prather, certify that on April 10, 2015 copies of the foregoing were mailed to:

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*Attorney for Jackson Energy Cooperative Corporation*



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Donald T. Prather