

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

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DEC. - 6 2013
PUBLIC SERVICE
COMMISSION

IN THE MATTER OF:

FRANK MCANINCH)	
)	
COMPLAINANT)	
)	CASE NO.
V.)	2013-00165
)	
)	
TAYLOR COUNTY RURAL ELECTRIC COOPERATIVE CORPORATION)	
)	
DEFENDANT)	

**TAYLOR COUNTY RURAL ELECTRIC COOPERATIVE CORPORATION'S
MOTION TO FIX / EXTEND TIME FOR RESPONSES
TO REQUESTS FOR INFORMATION**

Defendant, Taylor County Rural Electric Cooperative Corporation ("Taylor County"), by counsel, moves the Commission to fix January 3, 2014, as the due date for Defendant's responses to Complainant's supplemental requests for information, and to extend to that same date (January 3, 2014), the time period for Defendant's responses to the Commission Staff's Second Request for Information.

As grounds for and in support of the forgoing Motion, Defendant, by counsel, advises the Commission as follows:

1. That there was entered in this proceeding on June 17, 2013 a typical Order providing for a procedural schedule. That procedural schedule was then suspended by the Commission's Order of September 3, 2013, in order that the Commission might deal

with issues of procedural irregularity in the Complainant's execution, filing and service of documents herein.


2. The Commission, by Order entered November 12, 2013, permitted the late filing of a number of documents previously tendered upon behalf of Complainant. That Order of the Commission did not purport to establish an amended procedural schedule herein.

3. Included within the documents which were deemed acceptable for filing by the Commission's Order of November 12, 2013, was a document entitled "Complainant's Supplemental Request for Information", which was obviously intended to be directed to Taylor County. That document includes 62 Interrogatories, most of which are either entirely fanciful, or entirely irrelevant to this proceeding, or both. However, there are included within those Interrogatories some which are directed to service provided by Taylor County to enterprises which are deemed questionably permanent, such as sawmills. Because Complainant has applied for service to a sawmill located upon property which he occupies, but with respect to which he holds no ownership interest, Taylor County would presume that those Interrogatories to be arguably relevant to the issues raised as a part of this proceeding. Taylor County has thus undertaken to segregate prior sawmill and related services, and to determine with what frequency such services were charged, upon installation, the estimated cost of removal consistent with the provisions of Taylor County's tariff, and the subsequent credits earned by such customers consistent with the tariff. That process has proved to be extremely time consuming as the information sought is not easily retrievable from Taylor County's database, and requires instead historical research by staff. Taylor County thus requests, in light of the forthcoming holiday season and the attendant staff vacation scheduled

coincident therewith, that it be permitted to respond to Complainant's subject requests on or before January 3, 2014.

4. On December 3, 2013, the Commission Staff submitted to Taylor County its Second Request for Information, responses to which are directed on or before December 17, 2013. Request Nos. 4 and 5 will require staff investigation of historical circumstances in order to provide a response. In particular, Request No. 5 inquires as to when Taylor County's tariff first included a section related to "Distribution Line Extensions to Mobile Homes", and in what proceeding that tariff provision was first submitted to, and approved by, the Commission. Taylor County's representatives, as well as its counsel, recognize that the research necessary to respond to this request is likely to be both difficult and time-consuming, and that that task could not reasonably be completed within the two weeks provided for same.

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By 
ROBERT SPRAGENS, JR.
Counsel for Taylor County Rural
Electric Cooperative Corporation

I hereby certify that a true copy of
the foregoing was mailed this
5th day of December, 2013.

Original and 10 Copies to:

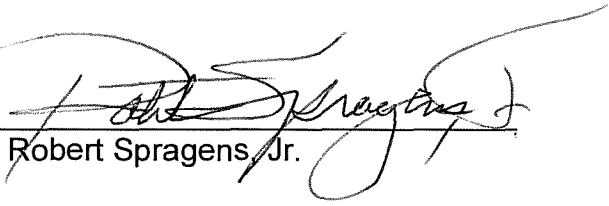
Mr. Jeff Derouen, Executive Director
Kentucky Public Service Commission
211 Sower Boulevard
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And One copy to:

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Complainant

By


Robert Spragens, Jr.