COMMONWEALTH OF KENTUCY BEFORE THE PUBLIC SERVICE COMMISSION CASE NO. 2013-00291

HAROLD BARKER;)		
ANN BARKER; and)		
BROOKS BARKER,)		
COMPLAINANTS)		
)	MOTION TO COMPEL	
V.)		RECEIVED
)		
EAST KENTUCKY POWER)		JUN 15 2015
COOPERATIVE, INC.,)		2010
DEFENDANT)		PUBLIC SERVICE COMMISSION
* * * * *	****	*****	

Come the Complainants, **HAROLD BARKER**, **ANN BARKER** and **BROOKS BARKER**, by counsel, and move the Kentucky Public Service Commission as follows:

The Barkers and their engineer John Pfeiffer have received no response from the Defendant to the Complainants' letter dated December 9, 2014 requesting voltage and load data for the 345kV/138kV Smith Hunt Sideview North-Clark transmission lines that run through their property.

The Defendant has also not responded to the Barkers' settlement proposal submitted on the same date of December 9, 2014.

The Complainants' last correspondence from the Defendant was on August 14, 2014. The Complainants feel that ample time has been given for the Defendant to submit the requested information and cannot understand why the Defendant is delaying correspondence involving their case no. 2013-00291, currently before the Commission.

The Barkers are seeking to resolve case no. 2013-00291 but feel that Defendant needs to also be willing to submit information when requested in order to do so.

Respectfully submitted,

M. ALEX ROWADY, ESQ.

Blair & Rowady, P.S.C. 212 South Maple Street Winchester, Kentucky 40391

(859) 744-3251

ATTORNEY FOR COMPLAINANTS

CERTIFICATE OF SERVICE

This is to certify that the original and eight true copies of the foregoing was hand-delivered to Kentucky Public Service Commission, P.O. Box 615, Frankfort, Kentucky 40602-0615 and a true copy was sent by first-class mail to David S. Samford, Esq., Gross Samford, PLLC, Attorneys for Defendant, 2365 Harrodsburg Road, Suite B325, Lexington, Kentucky 40504, this 3 day of June, 2015.

M. ALEX ROWADY, ESQ.