

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

INVESTIGATION OF GRAYSON RURAL)	
ELECTRIC COOPERATIVE CORPORATION'S)	CASE NO.
REQUEST TO MODIFY SCHEDULE 14(B) AND)	2014-00083
SCHEDULE 3 OF ITS TARIFF PROVISIONS)	

COMMISSION STAFF'S INITIAL REQUEST FOR INFORMATION
TO GRAYSON RURAL ELECTRIC COOPERATIVE CORPORATION

Grayson Rural Electric Cooperative Corporation ("Grayson"), pursuant to 807 KAR 5:001, is to file with the Commission the original and ten copies of the following information, with a copy to all parties of record. The information requested herein is due within 14 days of the date of this request. Responses to requests for information shall be appropriately bound, tabbed and indexed. Each response shall include the name of the witness responsible for responding to the questions related to the information provided.

Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association or a governmental agency, be accompanied by a signed certification of the preparer or person supervising the preparation of the response on behalf of the entity that the response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

Grayson shall make timely amendment to any prior response if it obtains information which indicates that the response was incorrect when made or, though

correct when made, is now incorrect in any material respect. For any request to which Grayson fails or refuses to furnish all or part of the requested information, Grayson shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention should be given to copied material to ensure that it is legible. When the requested information has been previously provided in this proceeding in the requested format, reference may be made to the specific location of that information in responding to this request. When applicable, the requested information shall be separately provided for total company operations and jurisdictional operations.

1. Refer to paragraph 2 of the motion filed by Grayson on February 3, 2014, ("Motion") in Case No. 2012-00426¹ in which Grayson requests "[t]hat the Schedule 14(b) rate be \$1,131.19, the same as was in existence prior to the July 31, 2013 Order." Confirm that the customer charge in effect for Schedule 14(b) prior to July 31, 2013, was \$1,136.37 which was approved in Case No. 2010-00174² on January 14, 2011. If this cannot be confirmed, provide a copy of a Commission Order that approved a customer charge of \$1,131.19 for Schedule 14(b).

2. Refer to paragraph 3 of the Motion in which Grayson requests that there be no specific customer charge for Schedule 3. Grayson also "requests an order that the appropriate customer charge be based upon the type of service that matched the use of the building referenced therein."

¹ Case No. 2012-00426, *Application of Grayson Rural Electric Cooperative Corporation for an Adjustment of Rates* (Ky. PSC July 31, 2013).

² Case No. 2010-00174, *Application of Grayson Rural Electric Cooperative Corporation for Pass-Through of East Kentucky Power Cooperative, Inc. Wholesale Rate Adjustment* (Ky. PSC Jan. 14, 2011.)

a. Explain why Schedule 3 was originally established as a separate tariff class rather than as a rider.

b. State the number of customers currently taking service under Schedule 3.

c. If Grayson's proposal for Schedule 3 is approved, state whether Grayson believes that the currently approved energy rate of \$.06562 should be reduced to \$.06546 to equal 60 percent of the Schedule 1 energy charge. Explain the response.

d. Explain in detail Grayson's request that "the appropriate customer charge be based upon the type of service that matched the use of the building referenced therein."

3. Refer to paragraph 5 of the Motion.

a. Grayson states that it believes that the July 31, 2013 Order inadvertently changed the 14(b) customer charge to \$1,098.28. Explain the reference to \$1,098.28 and provide its location in the July 31, 2013 Order.

b. State whether Grayson currently serves any customers pursuant to Schedule 14(b).



Jeff Derouen
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DATED **MAY 05 2014**

cc: Parties of Record

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