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PUBLIC SERVICE

COMMISSION

COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

MR. BILL'S GROCERY		
)	
Complainant)	
)	Case No. 2014-00194
V.		
)	
JACKSON ENERGY COOPERATIVE)	
CORPORATION)	
)	
Defendant)	

MR. BILL'S GROCERY RESPONSE TO DEFENDANT'S MOTION TO DISMISS

Comes now the Complainant, Mr. Bill's Grocery, by and through counsel, and provides the following Response to the Defendant's Motion to Dismiss:

All facts stated by Defendant in its Motion to Dismiss are correct, except that the Complainant completely disregarded the Commission's order and correspondence. In Response, counsel for the Complainant states that he has not received any electronic information pertaining to this case. That within the past two weeks the undersigned, through his staff, have left messages with "Renee" at the commission inquiring as to any electronic Orders or Answers which may have been issued or filed. That upon this date executed below, the undersigned spoke with "Renee", who advised she had received an inquiry from my office last week and that there had been activity in the file and in fact my office was late in responding to certain request for

information. That "Renee" provided a wed site from which my office immediately downloaded such Request and that certain Responses have been filed simultaneously with this Response. That the undersigned office believes in good faith that such failures to received electronic information have been corrected and will not occur in the future.

The undersigned request that the Commission deny the Defendant's Motion to Dismiss due to an unknown IP problem and accept the late Responses of the Complainant tendered simultaneously herewith and allow this matter to move toward the consideration of the merits of this case.

Respectfully Submitted By,

Bill/Meader

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CERTIFICATE OF SERVICE

The undersigned counsel hereby certifies hat a true and correct copy of this Response to Motion to Dismiss was served by mailing a copy of same by first class mail, postage prepaid, to the following:

Original and Seven Copies to:

Mr. Jeff R. Derouen Kentucky public Service Commission P.O. Box 615 211 Sower Blvd. Frankfort, Kentucky 40602-0615

Copy to:

Hon. Clayton Oswald P.O. Box 3440 1306 W. 5th St., Suite 100 London, Kentucky 40743-3440

on this the 12th day of September, 2014.

Attorney for Mr. Bill's Grocery