

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

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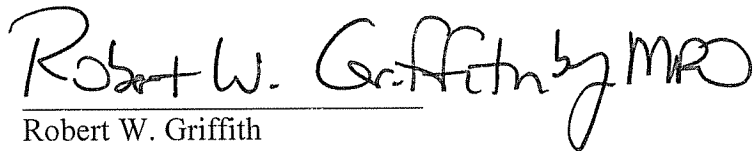
IN THE MATTER OF:

APPLICATION OF EAST KENTUCKY)
POWER COOPERATIVE FOR A)
CERTIFICATE OF PUBLIC CONVENIENCE)DOCKET NO.
AND NECESSITY FOR CONSTRUCTION)2005-00207
OF TRANSMISSION FACILITIES IN)
BARREN, WARREN, BUTLER, AND)
OHIO COUNTIES, KENTUCKY)

INTERVENORS' MOTION TO COMPEL EAST KENTUCKY POWER
COOPERATIVE'S RESPONSE TO DATA REQUESTS

Intervenors, Carroll Tichenor, Doris Tichenor, John Colliver, and H. H. Barlow, by counsel, hereby file this motion to compel East Kentucky Power Cooperative ("Applicant") to respond to Intervenors' data requests. To more than half of Intervenors' requests, the Applicant objected on grounds of relevance. Yet, as discussed below, the Applicant has conceded the relevance of all information requested. The Applicant's refusal to respond has prejudiced Intervenors and compromised the Commission's ability to decide this case based on all the facts. To avoid further prejudice and to ensure the integrity of these proceedings, the Commission must require the Applicant to produce all responsive information.

Respectfully submitted,



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Counsel for Intervenors

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing was duly served by mailing, first class postage prepaid to the following:

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This the 8th day of September, 2005.



Mark F. Roberts
Counsel for Intervenors

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