

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

WALTER CALLIHAN)	
)	
COMPLAINANT)	
)	
v.)	CASE NO. 2011-00351
)	
GRAYSON RURAL ELECTRIC COOPERATIVE CORPORATION)	
)	
DEFENDANT)	

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

Pursuant to 807 KAR 5:001, Grayson Rural Electric Cooperative Corporation ("Grayson RECC") shall file with the Commission no later than November 7, 2011 the original and 10 copies of the following information, with a copy to all parties of record. 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 RECC 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 RECC fails or refuses to furnish all or part of the requested information, Grayson RECC 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. State whether Grayson RECC has provided electric service to Walter Callihan at any time since February 12, 2007. If yes, state the period in which Grayson RECC provided such service, the reasons why Grayson RECC resumed service, and the reasons for Grayson RECC subsequently terminating service.

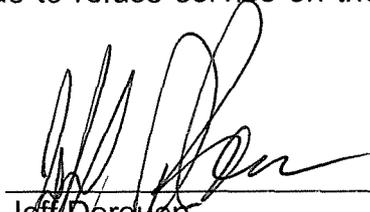
2. State the amounts of any payments that Mr. Callihan has made to Grayson RECC since February 12, 2007.

3. Describe Grayson RECC's efforts since February 12, 2007 to collect outstanding debts owed by Mr. Callihan for electric service.

4. State whether Grayson RECC has initiated any legal proceedings to collect on the amounts that Mr. Callihan owed Grayson RECC as of February 12, 2007.

5. State whether legal proceedings to collect the outstanding debt that Mr. Callihan owes to Grayson RECC for electric service would be barred by the statute of limitations. Explain.

6. Explain why, if the statute of limitations bars any legal action by Grayson RECC to collect any outstanding debts for electric service that Mr. Callihan owed, Grayson RECC should be permitted to continue to refuse service on the basis of such debts.



Jeff Derouen
Executive Director
Public Service Commission
P.O. Box 615
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DATED: OCT 27 2011

cc: Parties of Record

Walter Callihan
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