COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

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PUBLIC SERVICE COMMISSION

In the Matter Of:

Petition And Complaint Of Kentucky Power

Power

Power

Company For A Declaration Of Its Exclusive
Right Pursuant to KRS 278.018(1) To Serve
Those Portions Of The Sand Gap
Case No. 2012-00224
Estates In Greenup County, Kentucky Lying
Within Its Certified Territory In Lieu Of
Grayson Rural Electric Cooperative Corporation

Case No. 2012-00224

KENTUCKY POWER COMPANY'S MOTION FOR REHEARING OF COMMISSION'S ORDER OF NOVEMBER 30, 2012

On November 30, 2012, the Commission entered an Order granting the motion of Grayson Rural Electric Cooperative Corporation ("GRECC") for an extension of time to serve requests for information upon Kentucky Power Company ("Kentucky Power"). The Commission's Order included an amended procedural schedule that set forth certain deadlines for responding to information requests and filing testimony. Kentucky Power does not object to the Commission's decision to award GRECC additional time to serve information requests. However, pursuant to KRS 278.400, Kentucky Power asks the Commission to revisit certain of the deadlines imposed in the amended procedural schedule.

First, the amended procedural schedule does not specify deadlines for GRECC to respond to information requests issued to it by the Commission Staff and Kentucky Power. The original procedural schedule called for Kentucky Power and GRECC to respond to information requests simultaneously. Kentucky Power submits that the amended procedural schedule should be revised so that it is clear that GRECC's information request responses are due to be filed simultaneously with Kentucky Power's responses.

Second, the amended procedural schedule calls for Kentucky Power to respond to the Commission Staff's Information Requests on December 5, 2012 and provides GRECC until December 12, 2012 to issue its Information Requests to Kentucky Power. Under this timeline, GRECC will be able to review Kentucky Power's responses to the Commission Staff's Information Requests before drafting its Information Requests to Kentucky Power. This advantage to GRECC will be prejudicial to Kentucky Power. Kentucky Power did not have the benefit of GRECC's responses to the Commission Staff's Information Requests at the time it served its Information Requests upon GRECC.

The original procedural schedule called for Information Requests and the responses to those requests to be filed simultaneously by Kentucky Power and GRECC. Kentucky Power requests that the amended procedural schedule be revised to allow for simultaneous filings of all responses. Specifically, Kentucky Power asks that the deadline for all responses to Information Requests issued by the Commission Staff, GRECC or Kentucky Power to be extended to January 3, 2012, which is the date Kentucky Power's responses to GRECC's Information Requests are due under the amended procedural schedule. This requested revision will result in no prejudice to either party and it will preserve the intent of the original procedural schedule.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served by first class mail, postage prepaid, upon the following on this 3rd day of December, 2012.

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R. Benjamin Crittenden