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October 31, 2013

Mr. Jeff Derouen, Executive Director Kentucky Public Service Commission 211 Sower Boulevard P.O. Box 615 Frankfort, Kentucky 40602-0615 RECEIVED

NOV 1 2013

PUBLIC SERVICE COMMISSION

RE: Owen Electric Cooperative, Inc. PSC Case No. 2012-00503

Dear Mr. Derouen:

Please find enclosed the original and ten (10) copies of Owen Electric Cooperative, Inc.'s Answers to Grayson's Interrogatories to All Intervening Distribution Cooperative Respondents and Responses to Grayson's Documents Request.

Please contact me with any questions regarding this filing.

Respectfully yours,

CRAWFORD & BAXTER, P.S.C.

James M. Crawford

Attorney for Owen Electric Cooperative, Inc.

JMC/mns

Enclosures

COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

RECEIVED

NOV 1 2013

In the Matter of:		PUBLIC SERVICE
PETITION AND COMPLAINT OF GRAYSON)	COMMISSION
RURAL ELECTRIC COOPERATIVE)	
CORPORATION FOR AN ORDER)	
AUTHORIZING PURCHASE OF ELECTRIC)	
POWER AT THE RATE OF SIX CENTS PER)	
KILOWATT HOUR UP TO 9.4 MEGAWATTS)	CASE NO.
OF POWER VS. A RATE IN EXCESS OF SEVEN)	2012-00503
CENTS PER KILOWATT HOUR PURCHASED)	
FROM EAST KENTUCKY POWER COOPERATIVE	Ć	
UNDER A WHOLESALE POWER CONTRACT AS)	
AMENDED BETWEEN GRAYSON RURAL)	
ELECTRIC COOPERATIVE CORPORATION AND)	
EAST KENTUCKY POWER COOPERATIVE, INC.)	
,	,	

OWEN ELECTRIC COOPERATIVE, INC'S RESPONSES TO DOCUMENT REQUEST OF PETITIONER

Comes now Owen Electric Cooperative, Inc., by counsel, and for its Responses to Grayson's Requests for Documents, state as follows:

REQUEST NO. 1: Please set forth a copy of any and all documents or agreements between any of the distribution cooperatives and East Kentucky Power Cooperative concerning the use of common, legal representation in the within action.

RESPONSE: None.

REQUEST NO. 2: Please provide copies of any and all documents evidencing notice sent to or received by East Kentucky Power Cooperative, regarding a distribution cooperative's purchase or use of power from a source other than East Kentucky Power Cooperative, Inc., by any of the distribution cooperatives as well as any other.

RESPONSE: None.

REQUEST NO. 3: Please set forth any other document concerning the

purchase or use of power by any distribution cooperative from a source other than East Kentucky

Power either in utilization at the present time or contemplated in the future, that has been authorized by

a distributions co-op's Board as a result of any board action authorizing same.

RESPONSE: None

REQUEST NO. 4: Please provide copies of any and all documents evidencing the

extent of the electric power purchase or use from a source other than East Kentucky Power by any

distribution cooperative.

RESPONSE: See Response to No. 3.

REQUEST NO. 5: Please provide a copy of any document which any distribution

cooperative herein or East Kentucky Power Cooperative intends to use at the Final Hearing in the

within action, as well as the name, address and title of the person intending to offer said document into

evidence.

RESPONSE: Not yet determined.

REQUEST NO. 6: With respect to East Kentucky Power Cooperative only, please

provide copies of any and all documents evidencing any internal audit, investigation, analysis, study,

or any other undertaking evidencing the effect of Grayson Rural Electric Cooperative Corporation upon

East Kentucky Power Cooperative's financial status should Grayson Rural Electric Cooperative

Corporation purchase 9.3 megawatts of power from a source other than East Kentucky Power

Cooperative.

RESPONSE: N/A

REQUEST NO. 7: Please set forth any and all documents evidencing the power

purchased by East Kentucky Power from sources other than its own generating plants within the last

eighteen months.

RESPONSE: N/A

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REQUEST NO. 8: Please provide copies of any and ail documents evidencing East Kentucky Power's request for proposals for the sale of power to East Kentucky Power within the last eighteen months.

RESPONSE: N/A

REQUEST NO. 9: With respect to East Kentucky Power Cooperative, please set forth any and all documents evidencing the agreement, if any there be, between East Kentucky Power Cooperative and any distribution cooperative concerning the sale of power to any distribution cooperative for an amount of money less than that which is charged or exacted from any other distribution cooperative.

RESPONSE: N/A

VERIFICATION

By signing below, the individual answering these Requests for Production of Documents on behalf of Owen Electric Cooperative, Inc., hereby certifies that the foregoing responses are true and correct to the best of his knowledge and belief.

OWEN ELECTRIC COOPERATIVE, INC.

BY:

Mark Stallons, President and CEO

STATE OF KENTUCKY)
COUNTY OF OWEN)

Subscribed and sworn to before me by Mark Stallons as President and CEO of Owen Electric Cooperative, Inc., on this the 31st day of October, 2013.

Jotary Public, KY, State at Large

Respectfully submitted,

James M. Crawford

Counsel for Owen Electric Cooperative, Inc.,

Crawford & Baxter, P.S.C.

P.O. Box 353

Carrollton, Kentucky 41008

Phone: (502) 732-6688 Fax: (502) 732-8303 CBJ523@aol.com

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served by mailing a true and correct copy, by first-class postage prepaid mail, to all parties on the 3/ day of October, 2013, to:

W. JEFFREY SCOTT, P.S.C. ATTN: Hon. Jeffrey Scott Hon. Brandon M. Music 311 West Main Street P.O. Box 608 Grayson, KY 41143

GOSS & SAMFORD, PLLC ATTN: Hon. Mark David Goss Hon. David S. Samford 2365 Harrodsburg Road, Suite B325 Lexington, Kentucky 40504

TAYLOR, KELLER & OSWALD, PLLC ATTN: Hon. Clayton O. Oswald P.O. Box 3440 1306 West Fifth Street, Suite 100 London, Kentucky 40743

MATHIS, RIGGS & PRATHER, P.S.C. ATTN: Hon. Don Prather 500 Main Street, Suite 5 Shelbyville, Kentucky 40065

This is to further certify that the original of this document has been forwarded to the Kentucky Public Service Commission as follows: SUIT, PRICE, PRICE & RUARK, PLLC ATTN: Hon. Marvin Suit 207 Court Square Flemingsburg KY 41041 Kentucky Public Service Commission P.O. Box 615 Frankfort, Kentucky 40602-0615

BY:

Jámes M. Crawford