

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

WALTER CALLIHAN AND GOLDIE CALLIHAN)	
)	
COMPLAINANTS)	
)	
V.)	CASE NO. 2005-00280
)	
GRAYSON RURAL ELECTRIC COOPERATIVE CORPORATION)	
)	
DEFENDANT)	

COMMISSION STAFF'S INTERROGATORIES AND REQUESTS
FOR PRODUCTION OF DOCUMENTS TO GRAYSON RURAL
ELECTRIC COOPERATIVE CORPORATION

Pursuant to Administrative Regulation 807 KAR 5:001, Commission Staff requests that Grayson Rural Electric Cooperative Corporation ("Grayson RECC") file the original and 5 copies of the following information with the Commission within 20 days of this request, with a copy to all parties of record. Each copy of the information requested should be placed in a bound volume with each item tabbed. When a number of sheets are required for an item, each sheet should be appropriately indexed, for example, Item 1(a), Sheet 2 of 6. Include with each response the name of the witness who will be responsible for responding to questions relating to the information provided. Careful attention should be given to copied material to ensure its legibility.

1. State the dates during which Grayson RECC provided electric service to Mr. and Mrs. Callihan's residence.
2. State the date on which Grayson RECC discontinued electric service to Mr. and Mrs. Callihan's residence.

3. State the reason for which Grayson RECC discontinued electric service to Mr. and Mrs. Callihan's residence.

4. Provide all correspondence that Grayson RECC has with Mr. and Mrs. Callihan regarding the provision of electric service to their residence since January 1, 1998.

5. Provide all internal memorandum, correspondence, notes, and electronic mail messages in which Grayson RECC employees discuss the provision of electric service to Mr. and Mrs. Callihan's residence since January 1, 1998.

6. Provide the minutes of all meetings of Grayson RECC's Board of Directors in which the provision of electric service to Mr. and Mrs. Callihan's residence is discussed.

7. Provide a listing of all amounts billed to Mr. and Mrs. Callihan and all amounts received from Mr. and Mrs. Callihan for electric service that Grayson RECC provided to Mr. and Mrs. Callihan's residence.

8. List and describe all offers that Mr. or Mrs. Callihan have made to Grayson RECC to resolve any unpaid indebtedness. This description should include the date of the offer and Grayson RECC's response to the offer.

9. List and describe all instances in which a third party has offered or inquired about paying the Callihans' alleged indebtedness. This description should include the name of the third party, the date of the offer or inquiry, the terms of the offer, and Grayson RECC's response to the offer.

10. Provide a copy of Grayson RECC's current by-laws.

11. State whether Grayson RECC's current by-laws are set forth in the tariff that Grayson RECC has filed with the Public Service Commission of Kentucky or are

incorporated by reference in that tariff. If Grayson RECC's current bylaws are part of or incorporated by reference into its filed tariffs, indicate where they are located or incorporated by reference.

12. Identify the Public Service Commission proceeding to which Grayson RECC refers in its Answer in which the Public Service Commission found that the Complainants owed Grayson RECC "monies for electric service received, failed to pay therefore, and properly had their electric service terminated for nonpayment" and provide a copy of the Commission Order containing such findings.

13. State whether the application form to which Grayson RECC refers in its Answer is the same form that is contained in the tariff that Grayson RECC has filed with the Public Service Commission of Kentucky.

14. State whether Grayson RECC admits that a conversation occurred between Ruby Cordele and Carol Ann Fraley in which Ms. Cordele offered to pay the Callihan's alleged debt for electric service.

15. Assuming arguendo that the Callihans are indebted to Grayson RECC for electric service previously received, identify and describe the actions that the Callihans, or someone acting on their behalf, must undertake for Grayson RECC to resume the provision of electric service to the Callihans' residence.



Beth O'Donnell
Executive Director
Public Service Commission
P. O. Box 615
Frankfort, KY 40602

DATED: OCTOBER 13, 2005

cc: Parties of Record

Case No. 2005-00280