

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

AN INVESTIGATION INTO GRAYSON RURAL )  
ELECTRIC COOPERATIVE CORPORATION'S ) CASE NO. 2005-00280  
PROVISION OF ELECTRIC SERVICE TO WALTER )  
AND GOLDIE CALLIHAN )

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 8 copies of the following information with the Commission within 20 days of the date of this request, with a copy to all parties of record. Each copy of the information requested shall 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 shall be given to copied material to ensure its legibility. 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.

1. Refer to Transcript of Deposition of Carol Hall Fraley at 22. Ms. Fraley states that the Callihans received electric service under 3 different accounts. For each

account, state the account number and the rate schedule under which electric service was provided.

2. State whether each account listed in Grayson RECC's Response to Item 1 was separately metered.

3. Refer to Transcript of Deposition of Carol Hall Fraley at 22. Identify the tariff provision that permits Grayson RECC to roll the balance of one account onto the balance of another account that the same person holds.

4. Administrative Regulation 807 KAR 5:006, Section 14(f) provides that a "utility may terminate service at a point of delivery for nonpayment of charges incurred for utility service at that point of delivery."

a. State whether this regulation served as the basis for Grayson RECC's termination of electric service to the Callihans.

b. If yes, explain how Grayson RECC's policy of transferring the balance owed on a delinquent account to another account is consistent with this regulation.

5. State whether at any time on or after January 1, 2001, Walter Callihan or Goldie Callihan complained of problems with the accuracy of the meters that register the amount of electricity used at their property. For each complaint that the Callihans made, state the date of the complaint and the general nature of the complaint.

6. Identify who on or after January 1, 2001, read the meters that Grayson RECC used to register the amount of electricity used at Callihan property. If Grayson RECC employees read the meter, identify the employees.

7. State whether Grayson RECC used automated metering reading to read the meters that register the amount of electricity used at the Callihan property. If yes, identify the type of meter reading equipment used and state the date when Grayson RECC began using it to read its meters on at the Callihan property.

8. Refer to Grayson RECC's Response to Commission Staff's First Set of Interrogatories and Requests for Production of Documents, Item 11. In its response, Grayson RECC states that a copy of its Rules and Regulations are attached. The response filed with the Commission, however, does not have such attachment. Provide a copy of the Rules and Regulations to which Grayson RECC refers in its response.

9. Provide a copy of Grayson RECC's present by-laws.

10. State whether, at any time after Grayson RECC notified the Callihans of pending termination of their electric service for failure to pay, Walter Callihan or Goldie Callihan requested a partial payment plan be implemented. If yes, state when such request was made, identify the person who made the request, and Grayson RECC's response to this request.

11. State whether, after Grayson RECC discontinued electric service to the Callihans, Walter Callihan or Goldie Callihan applied for service during the months from November to March. If yes, state when such request was made, identify the person who made the request, and Grayson RECC's response to this request.

12. Refer to Transcript of Deposition of Carol Hall Fraley at 10; Refer to Transcript of Deposition of Don Combs at 6. Mr. Combs testified that Mr. Callihan always paid for electric service in cash. Ms. Fraley testified that Mr. Callihan also paid for electric service with a cashiers check. State which statement is correct. Explain.

13. State whether Grayson RECC's billing and collection records indicate the form in which the Callihans tendered payment for their electric bill. If yes, provide these records for all payments made on and after January 1, 2002.

14. Provide Grayson RECC's written procedures and policies regarding the disclosure of customer billing and usage information.

15. State whether the Grayson RECC facilities necessary to provide electric service to the Callihans' property, including metering equipment and service drop, are still on the Callihans' property.

16. At page 30 of the transcript of her deposition, Ms. Fraley states that Mr. Callihan must provide his permission before Grayson RECC sets a meter on the Callihan property. Assume that someone other than Walter Callihan applied to Grayson RECC for electric service to the Callihans' property and met the cooperative's other conditions. State whether Grayson would accept Mrs. Callihan's permission for set the meter in lieu of Walter Callihan.



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

DATED: July 17, 2006

cc: Parties of Record