

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

HAROLD BARKER,
ANN BARKER, and
BROOKS BARKER

COMPLAINANTS

V.

EAST KENTUCKY POWER COOPERATIVE,
INC.

DEFENDANT

CASE NO.
2013-00291

COMMISSION STAFF'S INITIAL REQUEST FOR INFORMATION
TO HAROLD BARKER, ANN BARKER, AND BROOKS BARKER

Harold Barker, Ann Barker, and Brooks Barker ("Complainants"), pursuant to 807 KAR 5:001, are to file with the Commission the original and eight copies of the following information, with a copy to all parties of record. The information requested herein is due 14 days after the date of this request. 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 the 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.

Complainants shall make timely amendment to any prior response if they obtain 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 Complainants fail or refuse to furnish all or part of the requested information, they shall provide a written explanation of the specific grounds for their failure to completely and precisely respond.

Careful attention shall 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.

1. Refer to East Kentucky Power Cooperative, Inc.'s ("EKPC") Offer of Settlement filed July 29, 2013, page 2, paragraph 2. EKPC's Offer of Settlement states that "[o]n information and belief, the Barkers constructed the structures identified in the Compliant after EKPC's original transmission line was constructed."

- a. Identify all of the structures identified in the Complaint.
- b. Identify when each of the structures identified in the Complaint was constructed.
- c. Provide the date(s) of the purchase of the 198-acre farm.

2. Refer to the Answer and Motion to Dismiss of EKPC dated October 10, 2013, Item 13. EKPC states that it has records that demonstrate the Complainants attended an open house held by EKPC in November 2005, which was for the purpose of discussing the details of the contemplated project. Also, EKPC states the Complainants made a specific request regarding the placement of one of the pole

structures that would be located on their property and that EKPC accommodated that request by adjusting the placement of the structure.

a. Confirm or deny the Complainants' attendance at the open house held by EKPC in November 2005.

b. Confirm or deny that the Complainants made a specific request regarding the placement of one of the pole structures that would be located on their property.

c. Confirm or deny that EKPC accommodated the Complainants' request by adjusting the placement of the subject pole structure.

3. State whether any other request was submitted to EKPC regarding the placement of the line prior to its upgrade.



Jeff Derouen
Executive Director
Public Service Commission
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DATED NOV 07 2013

cc: Parties of Record

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