

**COMMONWEALTH OF KENTUCKY  
BEFORE THE KENTUCKY PUBLIC SERVICE COMMISSION  
Case No. 2009-00020**

**RECEIVED**

FEB 12 2009

PUBLIC SERVICE  
COMMISSION

**In the matter of:**

**MR. AND MRS. JAMES RIDDICK,**

**V.**

**COMPLAINANTS**

**AMERICAN ELECTRIC POWER,  
KENTUCKY POWER,  
GRAYSON RURAL ELECTRIC,**

**DEFENDANTS**

**ANSWER OF GRAYSON RURAL ELECTRIC  
COOPERATIVE CORPORATION**

Comes now the Defendant, Grayson Rural Electric Cooperative Corporation, and for its answer to the complaint and pursuant to the Order entered herein January 30, 2009, states as follows:

1. The Answering Defendant believes that the complaint of the Complainants fails to state a cause of action against this Defendant necessitating a dismissal of same. .
2. The complaint and the attachments referred to in the complaint do not constitute a sufficient factual basis for the Commission to exercise jurisdiction over this Defendant.
3. The complaint and the attachments to the complaint set forth no allegation against Grayson Rural Electric Cooperative Corporation and only asserts that Grayson Rural Electric notified the Complainants that their request for service was in an area that was, according to the certified territory map located within the service territory of American Electric Power.

4. The Defendant, Grayson Rural Electric Cooperative Corporation further states that approximately September 9, 2008, a representative of Grayson Rural Electric Cooperative Corporation met with the Complainants and a representative of American Electric Power concerning the Complainants request for service. During that discussion it was clear and it was understood by a representative of Grayson Rural Electric Cooperative that all other persons understood the area was clearly within the certified service territory of American Electric Power. The representative of American Electric Power indicated that service would be provided as requested. There has been no contact with Grayson Rural Electric since that time.

**WHEREFORE**, the Defendant, Grayson Rural Electric Cooperative Corporation, having fully answered herein prays that the complaint be dismissed and the Complainants take nothing thereunder with respect to this Defendant, Grayson Rural Electric Cooperative Corporation.

RESPECTFULLY SUBMITTED

W. JEFFREY SCOTT PSC

BY: 

W. JEFFREY SCOTT  
P.O. BOX 608  
GRAYSON, KY 41148  
(606) 474-5194

This is to certify that the foregoing  
has been served upon the parties by  
mailing a true and correct copy of same to:

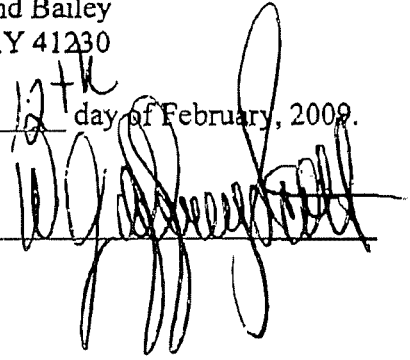
Kentucky Public Service Commission  
211 Sower Blvd.  
P.O. Box 615  
Frankfort, KY 40602-0615  
**VIA FACSIMILE: 502-564-3460**  
**ATTN: JEB PINNEY**

Mr. Riddick  
1230 Rockhouse Trace Road  
Louisa, KY 41230

Mr. Errol K. Wagner  
Director of Regulatory Services  
American Electric Power  
101A Enterprise Drive  
P.O. Box 5190  
Frankfort, KY 40602

Hon. Don Bailey  
Wilson and Bailey  
Louisa, KY 41230

This the 12<sup>th</sup> day of February, 2009.

  
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