

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION  
CASE NO. 2012-00224

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PUBLIC SERVICE  
COMMISSION

In the Matter of:

PETITION AND COMPLAINT OF KENTUCKY POWER

**MOTION**

Comes now Grayson Rural Electric Cooperative Corporation (GRECC), and moves the Commission for an Order extending the time within which GRECC must serve data requests upon Kentucky Power.

In support of this motion GRECC states that it was not served through its Counsel with the Order of November 8, 2012, setting dates for cut off of information requests and other cut off dates.

GRECC will be denied procedural due process and denied its substantive rights unless its legal counsel, who has entered an appearance in this case from the very beginning, is sent notices of the Commission's orders.

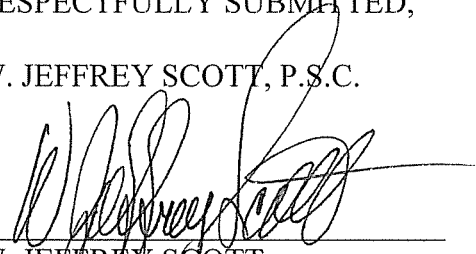
The requested extension of time is not unreasonable considering Counsel has been in consultation with a staff member of the Commission for proposed dates but was not given any notice by the Commission of the order that was erroneously sent by the Commission staff to GRECC corporate headquarters rather than legal counsel.

***WHEREFORE***, GRECC moves for the appropriate order as requested hereinabove and any and all other relief to which it may appear to be entitled.

RESPECTFULLY SUBMITTED,

W. JEFFREY SCOTT, P.S.C.

BY: \_\_\_\_\_

  
W. JEFFREY SCOTT  
ATTORNEY FOR GRECC  
311 WEST MAIN STREET  
P. O. BOX 608  
GRAYSON, KY 41143  
(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:

Hon. Mark R. Overstreet  
421 West Main Street  
P. O. Box 634  
Frankfort, KY 40602-0634

This <sup>20<sup>th</sup></sup> day of November, 2012.

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