

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

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PUBLIC SERVICE  
COMMISSION

In the Matter of:

PETITION AND COMPLAINT OF GRAYSON )  
RURAL ELECTRIC COOPERATIVE )  
CORPORATION FOR AN ORDER )  
AUTHORIZING PURCHASE OF ELECTRIC )  
POWER AT THE RATE OF SIX CENTS PER )  
KILOWATT HOUR UP TO 9.4 MEGAWATTS )  
OF POWER VS. A RATE IN EXCESS OF SEVEN )  
CENTS PER KILOWATT HOUR PURCHASED )  
FROM EAST KENTUCKY POWER COOPERATIVE )  
UNDER A WHOLESALE POWER CONTRACT AS )  
AMENDED BETWEEN GRAYSON RURAL )  
ELECTRIC COOPERATIVE CORPORATION AND )  
EAST KENTUCKY POWER COOPERATIVE, INC. )

CASE NO.  
2012-00503

**FLEMING-MASON ELECTRIC COOPERATIVE, INC'S  
RESPONSES TO DOCUMENT REQUEST OF PETITIONER**

Comes now Fleming-Mason Electric Cooperative, Inc., by counsel, and for its Responses to Grayson's Requests for Documents, state as follows:

**REQUEST NO. 1:** Please set forth a copy of any and all documents or agreements between any of the distribution cooperatives and East Kentucky Power Cooperative concerning the use of common, legal representation in the within action.

RESPONSE: None.

**REQUEST NO. 2:** Please provide copies of any and all documents evidencing notice sent to or received by East Kentucky Power Cooperative, regarding a distribution cooperative's purchase or use of power from a source other than East Kentucky Power Cooperative, Inc., by any of the distribution cooperatives as well as any other.

RESPONSE: None.

**REQUEST NO. 3:** Please set forth any other document concerning the purchase or use of power by any distribution cooperative from a source other than East Kentucky Power either in utilization at the present time or contemplated in the future, that has been authorized by a distributions co-op's Board as a result of any board action authorizing same.

**RESPONSE:** None

**REQUEST NO. 4:** Please provide copies of any and all documents evidencing the extent of the electric power purchase or use from a source other than East Kentucky Power by any distribution cooperative.

**RESPONSE:** See Response to No. 3.

**REQUEST NO. 5:** Please provide a copy of any document which any distribution cooperative herein or East Kentucky Power Cooperative intends to use at the Final Hearing in the within action, as well as the name, address and title of the person intending to offer said document into evidence.

**RESPONSE:** Not yet determined.

**REQUEST NO. 6:** With respect to East Kentucky Power Cooperative only, please provide copies of any and all documents evidencing any internal audit, investigation, analysis, study, or any other undertaking evidencing the effect of Grayson Rural Electric Cooperative Corporation upon East Kentucky Power Cooperative's financial status should Grayson Rural Electric Cooperative Corporation purchase 9.3 megawatts of power from a source other than East Kentucky Power Cooperative.

**RESPONSE:** N/A

**REQUEST NO. 7:** Please set forth any and all documents evidencing the power purchased by East Kentucky Power from sources other than its own generating plants within the last eighteen months.

**RESPONSE:** N/A

**REQUEST NO. 8:** Please provide copies of any and all documents evidencing East Kentucky Power's request for proposals for the sale of power to East Kentucky Power within the last eighteen months.

RESPONSE: N/A

**REQUEST NO. 9:** With respect to East Kentucky Power Cooperative, please set forth any and all documents evidencing the agreement, if any there be, between East Kentucky Power Cooperative and any distribution cooperative concerning the sale of power to any distribution cooperative for an amount of money less than that which is charged or exacted from any other distribution cooperative.

RESPONSE: N/A

VERIFICATION

By signing below, the individual answering these Requests for Production of Documents on behalf of Fleming-Mason Electric Cooperative, Inc., hereby certifies that the foregoing responses are true and correct to the best of his knowledge and belief.

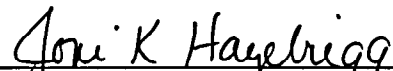
FLEMING-MASON ELECTRIC COOPERATIVE,  
INC.

BY:  \_\_\_\_\_  
Chris Perry, President and CEO

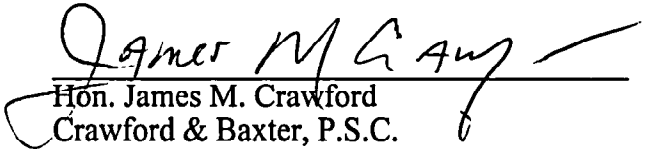
STATE OF KENTUCKY )  
COUNTY OF Fleming )

Subscribed and sworn to before me by Chris Perry as President and CEO of Fleming-Mason Electric Cooperative, Inc., on October 31, 2013.

My commission expires: June 20, 2014

 \_\_\_\_\_  
Notary Public, KY, State at Large

Respectfully submitted,



Hon. James M. Crawford  
Crawford & Baxter, P.S.C.  
P.O. Box 353  
Carrollton, Kentucky 41008  
Phone: (502) 732-6688  
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and  
Hon. Marvin Suit  
207 Court Square  
Fleming, Kentucky 41041  
Co-counsel for Fleming-Mason Electric  
Cooperative, Inc.

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served by mailing a true and correct copy, by first-class postage prepaid mail, to all parties on the 5th day of ~~October~~ November, 2013, to:

W. JEFFREY SCOTT, P.S.C.  
ATTN: Hon. Jeffrey Scott  
Hon. Brandon M. Music  
311 West Main Street  
P.O. Box 608  
Grayson, KY 41143

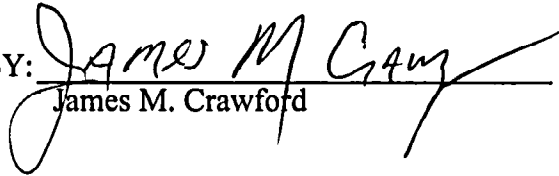
GOSS & SAMFORD, PLLC  
ATTN: Hon. Mark David Goss  
Hon. David S. Samford  
2365 Harrodsburg Road, Suite B325  
Lexington, Kentucky 40504

TAYLOR, KELLER & OSWALD, PLLC  
ATTN: Hon. Clayton O. Oswald  
P.O. Box 3440  
1306 West Fifth Street, Suite 100  
London, Kentucky 40743

MATHIS, RIGGS & PRATHER, P.S.C.  
ATTN: Hon. Don Prather  
500 Main Street, Suite 5  
Shelbyville, Kentucky 40065

This is to further certify that the original of this document has been forwarded to the Kentucky Public Service Commission as follows:

Kentucky Public Service Commission  
P.O. Box 615  
Frankfort, Kentucky 40602-0615

BY:   
James M. Crawford