

June 25, 2012

Mr. Jeff Derouen  
Executive Director  
Public Service Commission  
211 Sower Boulevard  
Frankfort, Kentucky 40602

Re: PSC Case No. 2012-00149

RECEIVED

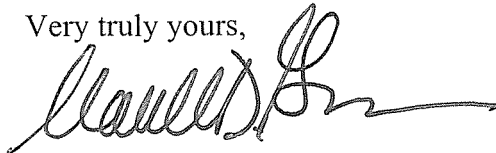
JUN 25 2012

PUBLIC SERVICE  
COMMISSION

Dear Mr. Derouen:

Please find enclosed for filing with the Commission in the above-referenced case an original and ten copies of East Kentucky Power Cooperative, Inc.'s Motion to Clarify the Procedural Schedule.

Very truly yours,

A handwritten signature in black ink, appearing to read "Mark David Goss", with a long horizontal flourish extending to the right.

Mark David Goss

CC: Parties of Record

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

2012 INTEGRATED RESOURCE PLAN OF )  
EAST KENTUCKY POWER COOPERATIVE, INC. ) Case No. 2012-00149  
)

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EAST KENTUCKY POWER COOPERATIVE, INC.'S  
MOTION TO CLARIFY THE PROCEDURAL SCHEDULE

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Comes now East Kentucky Power Cooperative, Inc. ("EKPC"), by counsel, pursuant to KRS 278.310, 807 KAR 5:001, Section 14, and 807 KAR 5:058, Section 11, and moves the Commission to clarify the procedural schedule entered by order on May 25, 2012. EKPC seeks clarification that its response to the interrogatories and requests for production of Sonia McElroy and the Sierra Club (collectively, the "Movants") are not due prior to July 25, 2012. In support, EKPC respectfully states as follows:

EKPC filed its 2012 Integrated Resource Plan ("IRP") on April 20, 2012. Gallatin Steel Company ("Gallatin") filed a motion for leave to intervene on May 7, 2012, which the Commission granted on May 17, 2012. The Commission then established the procedural schedule for this matter by Order entered on May 25, 2012. The procedural schedule called for the first set of interrogatories and requests for production of documents to be served on June 8, 2012, with EKPC's response due on June 24, 2012.<sup>1</sup> A second round of interrogatories and requests for production of documents may be served on or before July 10, 2012 with responses due on July 25, 2012.

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<sup>1</sup> Because June 24<sup>th</sup> is a Sunday, the deadline for tendering responses is extended to June 25, 2012.

On June 8, 2012, a full month after Gallatin moved to intervene, the Movants filed a motion for leave to intervene in this proceeding. In addition, they tendered fifty-four lengthy and detailed interrogatories and data requests – significantly more than what was propounded by the Commission’s Staff.<sup>2</sup> Upon receiving a copy of the Movants’ tendered discovery requests, the undersigned advised the Movants’ counsel in writing that EKPC would not respond to the interrogatories and requests for production until the Movants’ motion for leave to intervene was granted. The Movants did not object. The Commission granted the Movants’ motion for leave to intervene on June 21, 2012, which was only one working day before EKPC’s responses to the first set of interrogatories and requests for production of documents are due. EKPC cannot provide responses to the Movants’ fifty-four requests on June 24, 2012.

Accordingly, EKPC seeks clarification that it is not required to respond to the Movants’ data requests prior to the time when its responses to the second set of discovery requests are due on July 25, 2012.

Tendered this 25<sup>th</sup> day of June, 2012.

Respectfully submitted,



Mark David Goss  
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*Counsel for East Kentucky Power  
Cooperative, Inc.*

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<sup>2</sup> Gallatin Steel Company indicated that it did not have any interrogatories or data requests to propound in the first round of discovery.

## CERTIFICATE OF SERVICE

This will certify that a true and correct copy of the foregoing was served, by depositing same in the custody and care of the U.S. Mails, postage pre-paid, on this 25<sup>th</sup> day of June, 2012, addressed to the following:

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*Counsel for East Kentucky Power  
Cooperative, Inc.*