

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

RECEIVED

DEC 22 2015

PUBLIC SERVICE
COMMISSION

In the Matter of:

AN EXAMINATION BY THE PUBLIC SERVICE)	
COMMISSION OF THE ENVIRONMENTAL)	
SURCHARGE MECHANISM OF EAST KENTUCKY)	
POWER COOPERATIVE, INC. FOR THE SIX-)	
MONTH BILLING PERIODS ENDING JUNE 30, 2014)	CASE NO.
AND DECEMBER 31, 2014, TWO-YEAR BILLING)	2015-00281
PERIOD ENDING JUNE 30, 2015, AND THE PASS)	
THROUGH MECHANISM FOR ITS SIXTEEN)	
MEMBER DISTRIBUTION COOPERATIVES)	

**MOTION FOR AN EXTENSION OF TIME TO FILE
A REQUEST FOR HEARING OR SUBMIT CASE FOR
DECISION BASED ON THE RECORD**

Comes now East Kentucky Power Cooperative, Inc. ("EKPC"), by counsel, and, on behalf of its sixteen Members, hereby moves the Kentucky Public Service Commission ("Commission") for an extension of time until January 29, 2016 in which to file a request for hearing or submit this case for decision based on the record, respectfully stating as follows:

On August 31, 2015, the Commission issued an Order opening an investigation for the six-month and two-year review of EKPC's environmental surcharge and pass-through mechanisms. Attached as Appendix A to the August 31, 2015 Order is a procedural schedule setting December 30, 2015 as the last day for EKPC and its sixteen Members to request a hearing or submit this case for decision based on the record.

The August 31, 2015 Order also stated that EKPC and its Members could include with the filing of prepared direct testimony and information responses a proposal for a revised methodology

in accordance with the finding and decision in Case No. 2014-00051.¹ In the direct testimony filed in this proceeding, EKPC indicated that the Members still believed a modification to the methodology used to determine the over- or under-recoveries was needed. However, as of the filing of the direct testimony the Members had not reached a consensus on the appropriate methodology. The direct testimony indicated that the Members would request an informal conference with the Commission Staff when a consensus approach had been reached.²

The Members have been considering alternative methodologies while this case has been proceeding, and EKPC has been supportive of those efforts. While consensus was not reached on earlier alternatives, recently an alternative methodology has been suggested which could be acceptable to all the Members. However, due to the upcoming Christmas and New Year's holidays and the unavailability of key Member personnel, there is not sufficient time prior to the current December 30, 2015 deadline for a submission concerning the final disposition of this case for the Members to consider and evaluate this recent alternative methodology.

Given the Commission's finding and decision in Case No. 2014-00051 and the statement when opening the current review proceeding, EKPC and its Members believe it is reasonable to allow adequate time to consider this recent alternative methodology. As the only remaining event in the procedural schedule is the December 30, 2015 deadline for a submission concerning the final disposition of this case, EKPC and its Members further believe it is reasonable to request that the December 30, 2015 deadline be extended by thirty (30) days to allow for this evaluation.

¹ *In the Matter of An Examination by the Public Service Commission of the Environmental Surcharge Mechanism of East Kentucky Power Cooperative, Inc. for the Six-Month Billing Period Ending December 31, 2013 and the Pass Through Mechanism for Its Sixteen Member Distribution Cooperatives*, Order, Case No. 2014-00051, p. 9-10 (Ky. P.S.C., Aug. 25, 2015).

² See Direct Testimony of Isaac S. Scott, filed September 30, 2015, p. 11-12.

WHEREFORE, EKPC and its Members request that the Commission extend until January 29, 2016 the filing of a request for a hearing or submission of this case for decision based on the record.

This 22nd day of December, 2015.

Respectfully submitted,



Mark David Goss
David S. Samford
GOSS SAMFORD, PLLC
2365 Harrodsburg Road, Suite B325
Lexington, KY 40504
(859) 368-7740
mdgoss@gosssamfordlaw.com
david@gosssamfordlaw.com

Counsel for East Kentucky Power Cooperative, Inc.

CERTIFICATE OF SERVICE

This is to 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 22nd day of December, 2015, addressed to the following:

David Estep
President & General Manager
Big Sandy R.E.C.C.
504 11th Street
Paintsville, KY 41240-1422

Donald Smothers
Blue Grass Energy Cooperative Corp.
1201 Lexington Road
P. O. Box 990
Nicholasville, KY 40340-0990

Robert Christopher Brewer
President & CEO
Clark Energy Cooperative, Inc.
2640 Ironworks Road
P. O. Box 748
Winchester, KY 40392-0748

Ted Hampton
Manager
Cumberland Valley Electric, Inc.
Highway 25E
P. O. Box 440
Gray, KY 40734

Bill T. Prather
President & CEO
Farmers R.E.C.C.
504 South Broadway
P. O. Box 1298
Glasgow, KY 42141-1298

Carol Ann Fraley
President & CEO
Grayson R.E.C.C.
109 Bagby Park
Grayson, KY 41143

Carol Wright
President & CEO
Jackson Energy Cooperative Corporation
115 Jackson Energy Lane
McKee, KY 40447

Michael L. Miller
President & CEO
Nolin R.E.C.C.
411 Ring Road
Elizabethtown, KY 42701-6767

Tim Sharp
President & CEO
Salt River Electric Cooperative Corp.
111 West Brashear Avenue
P. O. Box 609
Bardstown, KY 40004

Allen Anderson
President & CEO
South Kentucky R.E.C.C.
925-929 North Main Street
P. O. Box 910
Somerset, KY 42502-0910

Joni K. Hazelrigg
President & CEO
Fleming-Mason Energy Cooperative, Inc.
1449 Elizaville Road
P. O. Box 328
Flemingsburg, KY 41041

James L. Jacobus
President & CEO
Inter-County Energy Cooperative Corp.
1009 Hustonville Road
P. O. Box 87
Danville, KY 40423-0087

Kerry K. Howard
CEO
Licking Valley R.E.C.C.
P. O. Box 605
271 Main Street
West Liberty, KY 41472

Mark Stallons
President & CEO
Owen Electric Cooperative, Inc.
8205 Highway 127 North
P. O. Box 400
Owenton, KY 40359

Debbie J. Martin
President & CEO
Shelby Energy Cooperative, Inc.
620 Old Finchville Road
Shelbyville, KY 40065

Barry L. Myers
Manager
Taylor County R.E.C.C.
625 West Main Street
P. O. Box 100
Campbellsville, KY 42719



Counsel for East Kentucky Power Cooperative, Inc.