COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

DEC 1 4 2011

PUBLIC SERVICE COMMISSION

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In the Matter of:

APPLICATION OF KENTUCKY POWER COMPANY FOR A CERTIFICATE OF PUBLIC CONVENIENCE AND NECESSITY TO CONSTRUCT A 138 KV TRANSMISSION LINE AND ASSOCIATED FACILITIES IN BREATHITT, KNOTT AND PERRY COUNTIES, KENTUCKY (BONNYMAN-SOFT SHELL LINE)

) CASE NO. 2011-00295

\* \* \* \* \* \* \* \*

## Motion to Cancel Hearing

Kentucky Power Company moves the Public Service Commission of Kentucky to cancel the January 4, 2011 hearing in this matter. In support of its motion, Kentucky Power states:

1. There are no intervenors in this proceeding and no person has requested an evidentiary hearing. No interested person has requested a local public hearing pursuant to 807 KAR 5:120, Section 3.

2. Kentucky Power believes that the record in this proceeding is fully developed, and subject to the need for further inquiry from the Commission or Staff, the matter should be submitted to the Commission for decision on the written record:

(a) Kentucky Power met on October 12, 2011 for approximately four hours with Michael D. Cannata, Jr., Accion, Group, Inc., the Commission's consultant, to address questions regarding the application. Attending the meeting on behalf of Kentucky Power were representatives of Kentucky Power's management, AEP Transmission, right-of way personnel, and George Reese, GAI Consultants, who developed, in conjunction with company personnel, the siting study.

(b) Prior to and following the October 12, 2011 meeting with the Commission's consultant, Kentucky Power also provided Mr. Cannata with written responses to the Consultant's informal data requests.

(c) On November 7, 2011, the Final Report of the Accion Group, Inc., entitled, "Focused Review of Documentation Filed By Kentucky Power Company for a Proposed Transmission Line from Soft Shell Substation to Bonnyman Substation, Case No. 2011-00295, was filed in the record of this proceeding. Among its findings are that Kentucky Power "has provided sufficient documentation in support of the need to construct ... [the project] in order to supply reliable service to its customers...."; "performed appropriate system studies and analyses...."; "previously made appropriate system additions in order to defer ... [the project] to the extent practical"; "considered all reasonable alternatives...."; and "considered proper social, environmental, and economic factors ... in the selection of its preferred route...." Final Report at 8.

(d) On or before December 16, 2011, Kentucky Power will have provided written responses to two rounds of data requests from Commission staff.

3. Kentucky Power remains willing to meet with Commission Staff to answer further inquiries, or to address otherwise any concerns the Commission or Staff may have about the proposed line and associated improvements.

Wherefore, Kentucky Power Company respectfully requests that the January 4,

2011 hearing be cancelled, and that this matter be submitted for decision by the

Commission on the record.

Respectfully, submitted Mark R. Overstreet R. Benjamin Crittenden STITES & HARBISON PLLC 421 West Main Street P. O. Box 634 Frankfort, Kentucky 40602-0634 Telephone: (502) 223-3477

COUNSEL FOR KENTUCKY POWER COMPANY