

Goss • Samford PLLC



Attorneys at Law

January 23, 2013

Mr. Jeff Derouen
Executive Director
Kentucky Public Service Commission
P.O. Box 615
211 Sower Boulevard
Frankfort, KY 40602

Re: Case No. 2012-00149

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 for Enlargement of Time.

Please contact me if you have any questions.

Very truly yours,

Mark David Goss
Counsel

Enclosures

Cc: Parties of Record

RECEIVED

JAN 23 2013

PUBLIC SERVICE
COMMISSION

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

IN THE MATTER OF:

2012 INTEGRATED RESOURCE PLAN OF) 2012-00149
EAST KENTUCKY POWER COOPERATIVE, INC.)

EAST KENTUCKY POWER COOPERATIVE, INC.'S
MOTION FOR ENLARGEMENT OF TIME

Comes now East Kentucky Power Cooperative, Inc. ("EKPC"), by and through counsel, and moves the Kentucky Public Service Commission ("Commission") for an Order enlarging the time by which EKPC must respond to the Comments of Intervenor Sierra Club on the 2012 Integrated Resource Plan ("IRP") of EKPC by 14 days, up to and including February 11, 2013.

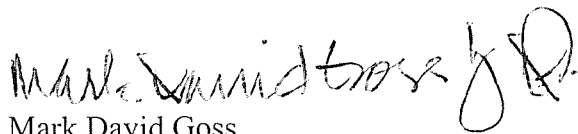
In support of this Motion, EKPC states that the Commission entered its Order on December 14, 2012, which set a January 14, 2013 date for any party to file written comments on EKPC's IRP or request an informal conference, and further set January 28, 2013 as the date for EKPC to file responses to written comments filed by any party. On January 14, 2013, the Sierra Club filed a very aggressive and misleading 35 page "Comments" document which accuses EKPC, among other things, of pulling data "...out of thin air..." (page 7), of taking steps to "discourage effective participation in the IRP process" (page 33), "...hinder[ing] an open and transparent [IRP] process..." (page 34), and which asks the Commission to require EKPC to "revise" (page 32) and to "address and correct...errors" (page 34) in the IRP. The Sierra Club's comments demand a substantive response from EKPC. In order for EKPC to adequately address the multitude of inaccuracies contained in the Sierra Club's comments, it needs an additional 14 days beyond January 28, 2013, to organize and prepare written responses.

This Motion is not made for purposes of hindrance or delay, but is intended for purposes of fully placing facts in the record. Additionally, since this is an IRP proceeding and there are no critical deadlines to be observed for its review under 807 KAR 5:058 Section 11, no harm or unfair prejudice would be suffered by any party if this Motion were sustained by the Commission.

WHEREFORE, EKPC respectfully requests that the Commission enter an Order approving EKPC's Motion for Enlargement of Time to provide responses to Comments of Intervenor Sierra Club on the 2012 IRP of EKPC for a period of 14 days, up to and including February 11, 2013.

Dated this 23rd day of January 2013.

Respectfully submitted,



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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. Mail, postage pre-paid, on this 23rd day of January 2013, addressed to the following:

Honorable Michael L. Kurtz
Boehm, Kurtz & Lowry
36 East Seventh Street
Suite 1510
Cincinnati, OH 45202

Joe Childers
Joe F. Childers & Associates
300 Lexington Building
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Counsel for East Kentucky Power Cooperative, Inc.