

# Goss ■ Samford PLLC



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April 9, 2015

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PUBLIC SERVICE  
COMMISSION

***Via Hand Delivery***

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

Re: In the Matter of: Petition and Complaint of Grayson RECC for an Order Authorizing Purchase of Electric Power at the Rate of Six Cents Per Kilowatts of Power vs. a Rate in Excess of Seven Cents Per Killowatt Hour Purchased From East Kentucky Power Cooperative Under a Wholesale Power Contract as Amended Between Grayson RECC and East Kentucky Power Cooperative, Inc.  
PSC Case No. 2012-00503

Dear Mr. Derouen:

Enclosed please find for filing with the Commission in the above-referenced case an original and ten (10) copies of East Kentucky Power Cooperative, Inc.'s Motion for an Extension of Time. Please return a file-stamped copy to me.

Do not hesitate to contact me if you have any questions.

Sincerely,

David S. Samford

Enclosures

M:\Clients\4000 - East Kentucky Power\1800 - Grayson Litigation\  
Correspondence\Ltr. to Jeff Derouen (2012-00503) - 150409

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 )  
KILOWATTS 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

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

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Comes now the Respondent, East Kentucky Power Cooperative, Inc. ("EKPC"), by counsel, and moves the Kentucky Public Service Commission ("Commission") for an Order granting a brief extension of time for EKPC to tender a response to the Motion for a Hearing filed by Grayson Rural Electric Cooperative Corporation ("Grayson") in this matter on April 3, 2015. Specifically, EKPC requests that it be allowed an additional ten (10) days (*i.e.*, until Monday, April 20, 2015) to file its response.

In support of this Motion, EKPC states that it requires additional time in order to determine and craft an appropriate response. Because of the complexity of the legal issues presented and the oft-changing nature of Grayson's requested relief, EKPC must undertake an extensive review of the lengthy factual record of this matter – including the voluminous written

discovery exchanged and substantial deposition testimony accumulated – in order to ascertain whether this case is ripe for adjudication. Moreover, Grayson’s recent filings in other matters involving EKPC (e.g., in Case No. 2010-00167, Case No. 2014-00226 and Case No. 2014-00451) demand EKPC’s immediate attention.

A relatively brief extension of time for EKPC to tender its response to Grayson’s Motion for a Hearing will not result in prejudice or unreasonable delay, especially considering that this case has been ongoing for approximately 2.5 years with little effort being expended by Grayson to pursue its claims. For these reasons, EKPC asserts that it has shown good cause for the relief it requests.

WHEREFORE, on the basis of the foregoing, EKPC respectfully requests that the Commission grant it an additional ten (10) days, *to wit*, until April 20, 2015, to tender its response to Grayson’s Motion.

This 9th day of April, 2015.

Respectfully submitted,



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*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 into the custody and care of the U.S. Mail, postage prepaid on this 9th day of April, 2015, addressed to the following:

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*Counsel for East Kentucky Power Cooperative, Inc.*