



November 21, 2013

Via Personal Delivery

Mr. Jeff Derouen, Executive Director
Case No. 2013-00259
Kentucky Public Service Commission
211 Sower Blvd.
Frankfort, KY 40601

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PUBLIC SERVICE
COMMISSION

Re: Case No. 2013-00259 Joint Motion of East Kentucky Power Cooperative and
Intervenors Sonia McElroy and Sierra Club to Modify the Procedural Schedule

Dear Mr. Derouen,

Enclosed please find one original and ten (10) copies of the Joint Motion of East Kentucky Power Cooperative and Intervenors Sonia McElroy and Sierra Club to Modify the Procedural Schedule, filed today in the above-referenced matter via personal delivery. By copy of this letter, all parties listed on the Certificate of Service have been served via USPS and e-mail. Please place this document of file.

Sincerely,

Kristin A. Henry
Senior Attorney
Sierra Club
85 Second Street
San Francisco, CA 94105
Phone: (415) 977-5716
kristin.henry@sierraclub.org

**COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION**

In the Matter of:

In the Matter of the Application of East Kentucky Power)	
Cooperative, Inc. for a Certificate of Public Convenience)	
and Necessity for Alteration of Certain Equipment at the)	CASE NO. 2013-00259
Cooper Station and Approval of a Compliance Plan)	
Amendment for Environmental Surcharge Cost Recovery)	

**JOINT MOTION OF EAST KENTUCKY POWER COOPERATIVE AND
INTERVENORS SONIA MCELROY AND SIERRA CLUB TO MODIFY THE
PROCEDURAL SCHEDULE**

Sonia McElroy and Sierra Club (collectively, “Intervenors”) and East Kentucky Power Cooperative (“EKPC”) hereby move the Kentucky Public Service Commission (“Commission”) to modify the procedural schedule to allow Intervenors to file testimony on November 27, 2013 and allow EKPC to file requests for information on December 9, 2013.

On September 20, 2013, the Commission issued a case management schedule in this docket. Consistent with that to that order, Intervenors submitted their initial information requests on October 4, 2013. EKPC’s responses to Intervenors’ requests were due on October 18, 2013, counsel for EKPC contacted counsel for Intervenors and requested an informal extension until October 25, 2013 to respond to those requests. Intervenors agreed to the extension as long as the deadline to file supplemental requests for information was moved from October 30, 2013 to November 4, 2013. This was acceptable to EKPC counsel if it could have three additional days from the date in the scheduling order to respond to those requests. Counsel also agreed to keep all other deadlines the same.

Consistent with EKPC and Intervenors' informal agreement, EKPC filed responses to Intervenors Initial Data Requests on October 25, 2013 and Intervenors filed supplemental requests for information on EKPC on November 4, 2012.

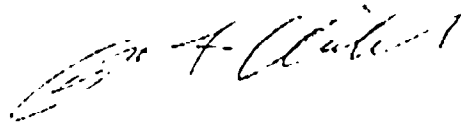
On November 12, 2013, counsel for Intervenors contacted counsel for EKPC and requested an extension of time to file direct testimony on November 27, 2012, two days later than required by the September 20 Order. In addition, counsel for Intervenors said that it would agree to extend the deadline for EKPC to submit requests for information until December 9, 2013. Counsel for Intervenors proposed to keep all other deadlines in the September 20 Order the same. On November 14, 2013, counsel for EKPC contacted counsel for Intervenors and agreed to the proposed extensions. In addition, counsel for EKPC noted that he had spoken with counsel for the other Intervenor, Gallatin Steel, and that Gallatin Steel had no objection to this proposed extension.

On November 15, 2013, EKPC filed its responses to Intervenors supplemental requests for information, which was consistent with EKPC and Intervenors' informal agreement.

WHEREFORE, Intervenors and EKPC request an extension of time to file direct testimony by Wednesday, November 27, 2013 and for EKPC to file all requests for information on December 9, 2013.

Respectfully submitted,

/s/ Mark David Goss
Mark David Goss
Goss Samford, PLLC
2365 Harrodsburg Road, Suite B130
Lexington, KY 40504
mdgoss@gosssamfordlaw.com



Joe Childers, Esq.
Joe F. Childers & Associates
300 Lexington Building
201 West Short Street
Lexington, Kentucky 40507
859-253-9824
859-258-9288 (facsimile)

Of counsel:

Kristin Henry
Sierra Club
85 Second Street
San Francisco, CA 94105
Phone: (415) 977-5716
kristin.henry@sierraclub.org

Shannon Fisk
Earthjustice
1617 JFK Blvd., Ste. 1675
Philadelphia, PA 19103
Phone: (215) 717-4520
sfisk@earthjustice.org

Matthew Gerhart
Earthjustice
705 Second Avenue, Suite 203
Seattle, WA 98104
Phone: (206) 343-7340 ext. 1024
mgerhart@earthjustice.org

Dated: November 21, 2013

CERTIFICATE OF SERVICE

I certify that I had filed with the Kentucky Public Service Commission and served a copy of this **JOINT MOTION OF EAST KENTUCKY POWER COOPERATIVE AND INTERVENORS SONIA MCELROY AND SIERRA CLUB TO MODIFY THE PROCEDURAL SCHEDULE** via electronic mail and U.S. Mail on November 21, 2013 to the following:

Michael L. Kurtz
Boehm, Kurtz & Lowry
36 East Seventh Street, Suite 1510
Cincinnati, OH 45202
mkurtz@bkllawfirm.com