

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF EAST KENTUCKY POWER)	
COOPERATIVE, INC. FOR A CERTIFICATE OF)	
PUBLIC CONVENIENCE AND NECESSITY)	
CONSTRUCTION OF AN ASH LANDFILL AT)	
J.K. SMITH STATION, THE REMOVAL OF)	CASE NO.
IMPOUNDED ASH FROM WILLIAM C. DALE)	2014-00252
STATION FOR TRANSPORT TO J.K. SMITH,)	
AND APPROVAL OF A COMPLIANCE PLAN)	
AMENDMENT FOR ENVIRONMENTAL)	
SURCHARGE RECOVERY)	

MOTION TO INTERVENE

Comes now, Grayson Rural Electric Cooperative Corporation (GRAYSON) and moves the Commission for an order pursuant to applicable rules of procedure and regulations of the Commission set forth in 807 KAR 5:001 for an order allowing Grayson to intervene in the within proceeding.

The application of East Kentucky Power Cooperative, Inc, (EAST KENTUCKY) seeks to be granted authority to proceed with reimpoundment of fly ash from its Dale power station location to a location on real estate on the site of its JK Smith abandoned power station. East Kentucky further seeks authority to pass along the costs of such a project, in excess of 29 million dollars, to its distribution cooperatives, one of which is Grayson. The request seeks this authority under the guise of the costs being an appropriate component of the environmental surcharge allowing such a pass through to the distribution cooperatives.

Inasmuch as Grayson is a member of East Kentucky Power, would be required to pay its portion of said costs were the relief requested by East Kentucky granted, and its members being required to pay same on their monthly electric bill, then Grayson has an integral and meaningful interest in the within application necessitating that it be allowed to intervene in the within proceeding.

Adequate protection cannot be given to Grayson by East Kentucky Power through the normal corporate process as East Kentucky Power refuses to routinely provide information to Grayson and keep it properly abreast of the method and manner of corporate decisions including those affecting the within proceeding and as such Grayson needs intervention in the within proceeding for its own protection and the protection of its members.

Wherefore, Grayson prays for the appropriate order.

RESPECTFULLY SUBMITTED,

W. JEFFREY SCOTT, P.S.C.

BY: 

W. JEFFREY SCOTT
ATTORNEY FOR GRECC
311 WEST MAIN STREET
P.O. BOX 608
GRAYSON, KY 41143
(606) 474-5194

This is to certify that the original plus 10 copies of the foregoing has been mailed by Express Mail to:

Kentucky Public Service Commission
211 Sower Boulevard
Frankfort, KY 40602

This is to further certify that the foregoing has been served upon the parties by mailing a true and correct copy of same to:

Hon. Mark David Goss
Goss-Samford
2365 Harrodsburg Road, Suite B-325
Lexington, KY 40504

Hon. David S. Samford
Goss-Samford
2365 Harrodsburg Road, Suite B-325
Lexington, KY 40504

Mr. Patrick Woods
East Kentucky Power Cooperative, Inc.
4775 Lexington Road
P.O. Box 707
Winchester, KY 40392-0707

Mr. Anthony "Tony" Campbell
President & CEO
East Kentucky Power Cooperative, Inc.
4775 Lexington Road
P.O. Box 707
Winchester, KY 40392-0707

This 29th day of October, 2014.


