

David S. Samford david@gosssamfordlaw.com (859) 368-7740

October 10, 2014

RECEIVED

OCT 10 2014

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

In the Matter of: An Application of East Kentucky Power Cooperative, Inc. for a Certificate of Public Convenience and Necessity for Construction of an Ash Landfill at J. K. Smith Station to Receive Impounded Ash from William C. Dale Station. and for Approval of a Compliance Plan Amendment for Environmental Surcharge Recovery PSC Case No. 2014-00252

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 to Respond to Grayson Rural Electric Cooperative's Motion for Leave to Intervene regarding the above-styled matter. Please return a file-stamped copy to me.

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

Very truly yours.

David S. Samford

### Enclosures

M:\Clients\4000 - East Kentucky Power\1450 - Dale Ash Landfill CPCN\Correspondence\Ltr. to Jeff Derouen - 141010

#### COMMONWEALTH OF KENTUCKY

#### BEFORE THE PUBLIC SERVICE COMMISSION

IN THE MATTER OF:		RECEIVED
AN APPLICATION OF EAST KENTUCKY	)	OCT 10 2014
POWER COOPERATIVE, INC. FOR A	)	PUBLIC SERVICE
CERTIFICATE OF PUBLIC CONVENIENCE	)	COMMISSION
AND NECESSITY FOR CONSTRUCTION OF AN	)	
ASH LANDFILL AT J. K. SMITH STATION TO	)	CASE NO.
RECEIVE IMPOUNDED ASH FROM WILLIAM	)	2014-00252
C. DALE STATION, AND FOR APPROVAL OF A	)	
COMPLIANCE PLAN AMENDMENT FOR	)	
ENVIRONMENTAL SURCHARGE RECOVERY	)	

# EAST KENTUCKY POWER COOPERATIVE, INC.'S MOTION FOR AN EXTENSION OF TIME TO RESPOND TO GRAYSON RURAL ELECTRIC COOPERATIVE'S MOTION FOR LEAVE TO INTERVENE

Comes now East Kentucky Power Cooperative, Inc. ("EKPC"), by and through counsel, and hereby moves the Commission for a fourteen day extension of time in which to file its response to the motion of Grayson Rural Electric Cooperative Corporation ("Grayson") for leave to intervene in this matter, respectfully stating as follows:

On October 3, 2014, Grayson filed a motion for leave to intervene in this matter. Pursuant to 807 KAR 5:001, Section 5(2), EKPC's response is due to be filed on or before October 10, 2014. Subsequent to Grayson's filing of the motion, its president and chief executive officer suggested that it might be productive for Grayson's management and Directors to meet with certain of EKPC's Officers and Directors and that no attorneys for either party will be present at this meeting. EKPC further understands that this meeting may take place within the next seven to ten days and, if successful, could be productive with regard to pending matters

involving EKPC and Grayson. Accordingly, EKPC respectfully requests a brief, fourteen day extension of time in which to file its response to Grayson's motion. Should the requested meeting between the two cooperatives' leadership not be successful, EKPC would reserve the right to file its response on or before, Friday, October 25, 2014. EKPC does not believe that granting this extension of time will require any corresponding change to the Commission's September 26, 2014 Scheduling Order.

For the foregoing reasons, EKPC respectfully requests that it be granted an additional fourteen days in which to file its response to Grayson's motion for leave to intervene in this proceeding.

This 10<sup>th</sup> day of October 2014.

Respectfully submitted,

Mark David Goss

David S. Samford

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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. Postal Service, postage pre-paid, on this the 10<sup>th</sup> day of October, 2014, addressed to the following:

W. Jeffrey Scott W. Jeffrey Scott, PSC P. O. Box 608 Grayson, KY 41143

Gregory T. Dutton Assistant Attorney General Office of the Attorney General Utility & Rate 1024 Capital Center Drive, Suite 200 Frankfort, KY 40601-8204

Counsel for East Kentucky Power Cooperative, Inc.