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RECEIVED

January 27, 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: 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 Objection to Grayson Rural Electric Cooperative Corporation's Motion to Continue 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,

Mark David Goss

Enclosures

M:\Clients\4000 - East Kentucky Power\1450 - Dale Ash Landfill
CPCN\Correspondence\Ltr. to Jeff Derouen - 150127

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

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)	CASE NO.
RECEIVE IMPOUNDED ASH FROM WILLIAM)	2014-00252
C. DALE STATION, AND FOR APPROVAL OF A)	
COMPLIANCE PLAN AMENDMENT FOR)	
ENVIRONMENTAL SURCHARGE RECOVERY)	

**OBJECTION OF EAST KENTUCKY POWER COOPERATIVE, INC.,
TO GRAYSON RURAL ELECTRIC COOPERATIVE CORPORATION'S
MOTION TO CONTINUE**

Comes now East Kentucky Power Cooperative, Inc. ("EKPC"), by and through counsel, and for its Objection to the Motion to Continue ("Motion") filed herein by Grayson Rural Electric Cooperative Corporation ("Grayson"), respectfully states as follows:

1. By Order entered January 22, 2015, the Kentucky Public Service Commission ("Commission") scheduled an evidentiary hearing in this matter for February 3, 2015. Grayson's Motion requests that the evidentiary hearing be postponed and rescheduled, ostensibly for a date sometime "after mid-March 2015," to avoid certain scheduling conflicts involving Grayson's counsel.

2. EKPC objects to Grayson's Motion on a number of grounds. First, the provisions of KRS 278.183(2) require that a decision be rendered in this matter within six (6) months of EKPC's submittal of its environmental compliance plan, *to wit*, on or before March 8, 2015. As Grayson made clear in its Motion, its counsel is not available to attend any hearing that may be

scheduled prior to at least mid-March, 2015. Based on these facts, there is no date to which the evidentiary hearing in this matter may be rescheduled that can satisfy both Grayson's counsel and relevant statutory requirements; because adherence to the relevant statutory requirements is compulsory, Grayson's requested relief must be denied.

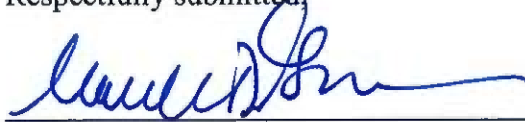
3. EKPC also objects to Grayson's Motion because postponement of the upcoming evidentiary hearing would result in undue complication and unnecessary expense. EKPC has already made arrangements with an expert witness to travel (by air) to the evidentiary hearing, and EKPC has taken the necessary steps to ensure that its counsel and other witnesses will be prepared for and attend the hearing on February 3, 2015. Additionally, EKPC has made provisions, at substantial expense, for the publication of the requisite notice of the hearing; thus, EKPC will be prejudiced if the evidentiary hearing is postponed at this juncture.

4. Finally, it must be noted that Grayson has not participated in this case in any meaningful way since it sought intervention herein on October 3, 2014. Despite multiple opportunities to do so, Grayson has propounded no requests for information and submitted no testimony. Although, when the Commission granted Grayson full-intervenor status on November 21, 2014, it found that Grayson may "present issues and develop facts that will assist the Commission in fully considering the matter," it remains unclear what, if any, contribution Grayson has made or will make in this proceeding. While Grayson is entitled to participate in the evidentiary hearing in this case, Grayson's activity (or, more precisely, inactivity) to date does not weigh in favor of rescheduling the hearing for its convenience.

WHEREFORE, on the basis of the foregoing, EKPC respectfully requests that Grayson's Motion be OVERRULED.

Done this 27th day of January, 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 deposited in the custody and care of the U.S. Mail, postage prepaid, on this the 27th day of January, 2015, addressed to the following:

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

W. Jeffrey Scott
P.O. Box 608
311 West Main Street
Grayson, KY 41143



Counsel for East Kentucky Power Cooperative, Inc.