



**Mark David Goss**

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November 12, 2015

***Via Hand-Delivery***

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

RECEIVED

NOV 12 2015

PUBLIC SERVICE  
COMMISSION

Re: In the Matter of: An Examination of the Application of the  
Fuel Adjustment Clause of Jackson Purchase Energy Corporation  
From November 1, 2014 through April 30, 2015  
PSC Case No. 2015-00254

Dear Mr. Derouen:

Enclosed please find for filing with the Commission in the above-referenced case an original and ten (10) copies of Jackson Purchase Energy Corporation's Notice of Entry of Appearance and Motion to Reschedule Hearing. 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

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

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PUBLIC SERVICE  
COMMISSION

In the Matter of:

AN EXAMINATION OF THE APPLICATION OF THE	)	
FUEL ADJUSTMENT CLAUSE OF JACKSON PURCHASE	)	CASE NO.
ENERGY CORPORATION FROM NOVEMBER 1, 2014	)	2015-00254
THROUGH APRIL 30, 2015	)	

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NOTICE OF ENTRY OF APPEARANCE

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Comes now Mark David Goss, of the law firm Goss Samford, PLLC, and does hereby give notice of his entry of appearance as counsel of record for Jackson Purchase Energy Corporation ("JPEC") in this matter.

Undersigned counsel respectfully requests that all future pleadings, correspondence, notices and documents related to the above-referenced matter be served upon counsel at the address listed below.

This 12th day of November 2015.

Respectfully submitted,



Mark David Goss  
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*Counsel for Jackson Purchase Energy  
Corporation*

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

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PUBLIC SERVICE  
COMMISSION

In the Matter of:

AN EXAMINATION OF THE APPLICATION OF THE	)	
FUEL ADJUSTMENT CLAUSE OF JACKSON PURCHASE	)	CASE NO.
ENERGY CORPORATION FROM NOVEMBER 1, 2014	)	2015-00254
THROUGH APRIL 30, 2015	)	

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**MOTION TO RESCHEDULE HEARING**

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Comes now Jackson Purchase Energy Corporation, ("JPEC"), by and through counsel, and for its Motion requesting that the Kentucky Public Service Commission ("Commission") reschedule the formal hearing in this matter that was originally scheduled for October 7, 2015 respectfully states as follows:

1. The Commission issued an order on August 14, 2015, scheduling a public hearing in this matter for October 7, 2015.
2. During the time the August 14, 2015 Order was received by JPEC, a change in management was taking place. Kelly Nuckols had retired as the President and Chief Executive Officer of JPEC and a replacement had not yet been named. The order setting the hearing was routed to Kelly Nuckols' office, where it was inadvertently left unopened and therefore JPEC personnel were unaware of the October 7, 2015 hearing.
3. JPEC has since named Dennis Cannon as the new Chief Executive Officer. JPEC regrets the oversight on its part regarding the October 7, 2015 hearing and respectfully requests the Commission to reschedule the hearing in this matter to a date that is convenient for the Commission.

4. JPEC will make certain that proper notice of the hearing is given and to be present in order for the Commission to conduct a hearing in this matter.

WHEREFORE, on the basis of the foregoing, JPEC respectfully requests that the Commission reschedule the formal hearing in this matter at its earliest convenience.

This 12<sup>th</sup> day of November, 2015.

Respectfully submitted,



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Mark David Goss  
David S. Samford  
Allyson L. Honaker  
M. Evan Buckley  
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*Counsel for Jackson Purchase Energy Corporation*

**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 12<sup>th</sup> day of November, 2015, addressed to the following:

Jennifer Black Hans  
Lawrence W. Cook  
Stephanie J. Kingsley  
Assistant Attorneys General  
1024 Capital Center Drive, Suite 200  
Frankfort, KY 40601-8204

A handwritten signature in blue ink, appearing to read "Lawrence W. Cook", written over a horizontal line.

*Counsel for Jackson Purchase Energy Corporation*