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**PUBLIC SERVICE
COMMISSION**

September 3, 2015

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: East Kentucky Power Cooperative, Inc.
Failure to Comply with KRS 278.020(2)
PSC Case No. 2015-00263

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 Response to the Commission's Order of August 18, 2015 and Motion to Schedule an Informal Conference. 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\1350 - Harold Barker Complaint -
PSC Case No. 2013-00291\Correspondence\Ltr. to Jeff Derouen (2015-00263)- 150903.docx

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

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PUBLIC SERVICE
COMMISSION

IN THE MATTER OF:

EAST KENTUCKY POWER
COOPERATIVE, INC.

FAILURE TO COMPLY WITH
KRS 278.020(2)

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CASE NO.
2015-00263

RESPONSE OF EAST KENTUCKY POWER COOPERATIVE, INC.
TO THE COMMISSION'S ORDER OF AUGUST 18, 2015 AND
MOTION TO SCHEDULE AN INFORMAL CONFERENCE

On August 18, 2015, the Kentucky Public Service Commission ("Commission") issued an Order directing East Kentucky Power Cooperative, Inc. ("EKPC"), to file a written response to the alleged violation set forth in the Commission's July 6, 2015, Order in Case No. 2013-00291 and as set forth in the findings in the August 18, 2015, Order. For its response to both the August 18, 2015 Order and the Certificate of Public Convenience and Necessity ("CPCN") section of the July 6, 2015 Order in Case No. 2013-00291, EKPC respectfully states as follows:

1. EKPC admits that is constructed an electric transmission line that crosses the property owned by the Complainants in Case No. 2012-00291.
2. EKPC admits that it did not seek or obtain a CPCN from the Commission prior to commencing construction of said transmission line. The basis for EKPC's determination that a CPCN was not required is generally set forth in EKPC's Post-Hearing Brief in Case No. 2012-00291, which is incorporated herein by reference.
3. EKPC denies that the alleged violation of KRS 278.020(2) was willful.

4. EKPC respectfully requests the Commission to schedule an informal conference for the purpose of: (a) narrowing the issues to be heard if a hearing proves necessary; and (b) discussing whether a settlement of the issue raised in the Commission's August 18, 2015 Order might be possible.
5. EKPC's willingness to discuss settlement is not, and should not be construed as, an admission of any liability or fault on its part. Any allegations for which a response is required, and that has not been expressly admitted herein, is hereby expressly denied.

NOW, THEREFORE, EKPC respectfully requests that the case be dismissed or, in the alternative, that an informal conference be scheduled with Commission Staff for the purpose of discussing the issues involved in this case, settlement and expediting resolution of this proceeding.

This 3rd day of September, 2015.

Respectfully submitted,



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