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October 5, 2015

Via Hand-Delivery

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

RECEIVED

OCT 05 2015

PUBLIC SERVICE
COMMISSION

Re: *In the Matter of: The Application of East Kentucky Power Cooperative, Inc. for Approval of the Acquisition of Existing Combustion Turbine Facilities form Bluegrass Generation Company, LLC at the Bluegrass Generating Station in LaGrange, Oldham County, Kentucky and for Approval of the Assumption of Certain Evidences of Indebtedness*
PSC Case No. 2015-00267

Dear Mr. Derouen:

Please find enclosed for filing with the Commission in the above-referenced case an original and ten (10) copies of East Kentucky Power Cooperative, Inc.'s Motion to Schedule Hearing.

Please return a file-stamped copy of the Motion to me, and please do not hesitate to contact me if you have any questions.

Very truly yours,

David S. Samford

Enclosures

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

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OCT 05 2015

In the Matter of:

PUBLIC SERVICE
COMMISSION

THE APPLICATION OF EAST KENTUCKY POWER)
COOPERATIVE, INC. FOR APPROVAL OF THE)
ACQUISITION OF EXISTING COMBUSTION TURBINE)
FACILITIES FROM BLUEGRASS GENERATION) Case No. 2015-00267
COMPANY, LLC AT THE BLUEGRASS GENERATING)
STATION IN LAGRANGE, OLDHAM COUNTY, KENTUCKY)
AND FOR APPROVAL OF THE ASSUMPTION OF CERTAIN)
EVIDENCES OF INDEBTEDNESS)

MOTION TO SCHEDULE HEARING

Comes now East Kentucky Power Cooperative, Inc. ("EKPC"), by and through counsel, and for its Motion requesting that the Kentucky Public Service Commission ("Commission") schedule a formal hearing in this matter at its earliest convenience, respectfully states as follows:

1. EKPC's Application requests that the Commission issue a Certificate of Public Convenience and Necessity for the acquisition and operation of the existing simple cycle combustion turbine facilities in LaGrange, Oldham County, Kentucky, from Bluegrass Generation Company, LLC, and for approval to assume certain evidences of indebtedness related to such acquisition. EKPC has requested the Commission grant the requested relief no later than December 1, 2015.

2. On or about July 31, 2015, the Commission entered an order prescribing a procedural schedule for this matter. Pursuant to the procedural schedule, EKPC has responded to two (2) sets of data requests propounded by Commission Staff, two (2) sets of data requests propounded jointly by Kentucky Utilities Company/Louisville Gas and Electric Company

(collectively, the “Companies”), and one (1) set of data requests propounded by the Attorney General. The only other intervenor in this case, Nucor Steel Gallatin (“Nucor”), did not propound data requests upon EKPC.

3. The procedural schedule required intervenor testimony to be filed no later than October 2, 2015. On that date, the Companies filed a letter stating they would not be filing testimony in this case. Moreover, neither the Attorney General nor Nucor has filed intervenor testimony.

4. The procedural schedule allows requests for information to be propounded on intervenors on or before October 13, 2015, and further allows EKPC to file rebuttal testimony on or before November 2, 2015. EKPC does not intend to propound any requests for information upon the intervenors and does not intend to file rebuttal testimony.

5. In light of the procedural posture of this case, EKPC requests that the Commission schedule a hearing in this matter as soon as practicable. There appears to be no remaining discovery to be conducted, and the expeditious resolution of this case is in the best interest of EKCP, its Owner-Members, and the ultimate consumers.

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

This 5th day of October, 2015.

Respectfully submitted,



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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 5th day of October, 2015, addressed to the following:

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