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SEP 03 2015

**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: An Examination by the Public Service
Commission of the Environmental Surcharge Mechanism of
East Kentucky Power Cooperative, Inc. for the Six-Month Billing
Periods Ending June 30, 2014 and December 31, 2014, Two-Year
Billing Period Ending June 30, 2015, and the Pass Through
Mechanism for its Sixteen Member Distribution Cooperatives
PSC Case No. 2015-00281

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 Commission Staff's First Request for Information Issued on August 31, 2015. Please return a file-stamped copy to me.

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

Sincerely,

David S. Samford

Enclosures

M:\Clients\4000 - East Kentucky Power\2002 - Environmental Surcharge\
Correspondence\Ltr. to Jeff Derouen (2014-00281) - 1509031.docx

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

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SEP 03 2015

**PUBLIC SERVICE
COMMISSION**

IN THE MATTER OF:

AN EXAMINATION BY THE PUBLIC SERVICE)	
COMMISSION OF THE ENVIRONMENTAL)	
SURCHARGE MECHANISM OF EAST KENTUCKY)	
POWER COOPERATIVE, INC. FOR THE SIX-)	
MONTH BILLING PERIODS ENDING JUNE 30, 2014)	CASE NO.
AND DECEMBER 31, 2014, TWO-YEAR BILLING)	2015-00281
PERIOD ENDING JUNE 30, 2015, AND THE PASS)	
THROUGH MECHANISM FOR ITS SIXTEEN)	
MEMBER DISTRIBUTION COOPERATIVES)	

**MOTION FOR AN EXTENSION OF TIME TO RESPOND TO
COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION ISSUED
ON AUGUST 31, 2015**

Comes now East Kentucky Power Cooperative, Inc. ("EKPC"), by counsel, and, on behalf of its sixteen Members, hereby moves the Kentucky Public Service Commission ("Commission") for a fourteen day extension of time in which to file its responses to Commission Staff's first request for information and its direct testimony, respectfully stating as follows:

On August 31, 2015, the Commission issued an Order opening an investigation for the six-month and two-year review of EKPC's environmental surcharge and pass-through mechanisms. Attached as Appendix A to the August 31 Order is a procedural schedule setting September 16, 2015, as the deadline to respond to Commission Staff's first request for information (Appendix B to the August 31 Order) and to file direct testimony. Due to numerous reasons, EKPC requests until September 30, 2015, to respond to the requests for information and to file its direct testimony.

This investigation covers a longer period of time (eighteen months) than the normal six-month review cases, and therefore, significant more time is needed to gather and prepare the large amount of accounting data that is needed in order to provide the requested information. Also, several key EKPC personnel, who scheduled vacations and other obligations around existing procedural deadlines in other pending cases, will be out of the office and unavailable at various times during the first two weeks of September. Without their input, EKPC will have a difficult time in thoroughly responding to the information requests.

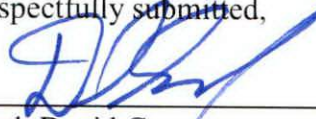
Furthermore, EKPC's Members have not yet determined whether or not to seek rehearing of the Commission's Order entered on August 25, 2015, in Case No. 2014-00051. This decision could complicate the current proceeding as the six month period under review in Case No. 2014-00051 is part of the two year review period that is the subject of this proceeding.

Each of these issues will negatively impact EKPC's ability to timely comply with the September 16, 2015, deadline in this proceeding. Since the next significant deadline in this case is not until mid-October and, as of the date of this motion, there are no intervenors, EKPC believes that granting a brief fourteen day extension will not result in any prejudice or unduly delay the proceeding.

WHEREFORE, EKPC requests a fourteen day extension until September 30, 2015, to respond to Commission Staff's first request for information and to file direct testimony in this proceeding.

This 3rd day of September, 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 served by depositing same in the custody and care of the U.S. Mails, postage pre-paid, on this 3rd day of September, 2015, addressed to the following:

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