

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

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**PUBLIC SERVICE  
COMMISSION**

**In the Matter of:**

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

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**MOTION FOR AN EXTENSION OF TIME TO FILE  
A REQUEST FOR HEARING OR SUBMIT CASE FOR  
DECISION BASED ON THE RECORD**

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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 an extension of time until January 29, 2016 in which to file a request for hearing or submit this case for decision based on the record, 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, 2015 Order is a procedural schedule setting December 30, 2015 as the last day for EKPC and its sixteen Members to request a hearing or submit this case for decision based on the record.

The August 31, 2015 Order also stated that EKPC and its Members could include with the filing of prepared direct testimony and information responses a proposal for a revised methodology

in accordance with the finding and decision in Case No. 2014-00051.<sup>1</sup> In the direct testimony filed in this proceeding, EKPC indicated that the Members still believed a modification to the methodology used to determine the over- or under-recoveries was needed. However, as of the filing of the direct testimony the Members had not reached a consensus on the appropriate methodology. The direct testimony indicated that the Members would request an informal conference with the Commission Staff when a consensus approach had been reached.<sup>2</sup>

The Members have been considering alternative methodologies while this case has been proceeding, and EKPC has been supportive of those efforts. While consensus was not reached on earlier alternatives, recently an alternative methodology has been suggested which could be acceptable to all the Members. However, due to the upcoming Christmas and New Year's holidays and the unavailability of key Member personnel, there is not sufficient time prior to the current December 30, 2015 deadline for a submission concerning the final disposition of this case for the Members to consider and evaluate this recent alternative methodology.

Given the Commission's finding and decision in Case No. 2014-00051 and the statement when opening the current review proceeding, EKPC and its Members believe it is reasonable to allow adequate time to consider this recent alternative methodology. As the only remaining event in the procedural schedule is the December 30, 2015 deadline for a submission concerning the final disposition of this case, EKPC and its Members further believe it is reasonable to request that the December 30, 2015 deadline be extended by thirty (30) days to allow for this evaluation.

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<sup>1</sup> *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 Period Ending December 31, 2013 and the Pass Through Mechanism for Its Sixteen Member Distribution Cooperatives*, Order, Case No. 2014-00051, p. 9-10 (Ky. P.S.C., Aug. 25, 2015).

<sup>2</sup> See Direct Testimony of Isaac S. Scott, filed September 30, 2015, p. 11-12.

WHEREFORE, EKPC and its Members request that the Commission extend until January 29, 2016 the filing of a request for a hearing or submission of this case for decision based on the record.

This 22<sup>nd</sup> day of December, 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 22<sup>nd</sup> day of December, 2015, addressed to the following:

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