

ATTORNEYS AT LAW | PLLC

RECEIVED

MAR 15 2016

PUBLIC SERVICE  
COMMISSION

March 15, 2016

Executive Director  
Public Service Commission  
211 Sower Boulevard  
Frankfort, Kentucky 40602

Re: PSC Case No. 2015-00281

Dear Executive Director:

Please find enclosed for filing with the Commission in the above-referenced case, an original and seven copies of the following documents:

- A revised form for the proposed alternative methodology that shows in detail the amortizations from past cases, identified as Revised Exhibit ISS-1.
- An example of the proposed alternative methodology utilizing figures for Owen Electric Cooperative.
- A motion to submit this case on the record and not have a hearing.

The first two items were discussed during the informal conference held on March 2, 2016.

Very truly yours,

A handwritten signature in blue ink that reads "David S. Samford (by HRC)".

David S. Samford  
Counsel

Enclosures

(Cooperative Name) - Calculation of (Over)/Under Recovery					
		EKPC Invoice Month recorded Member's Books	Billed to Retail Consumer & recorded on Member's Books	Monthly (Over) or Under	Cumulative (Over) or Under
Line No.	Month & Year	(2)	(3)	(4)	(5)
1	Previous (Over)/Under-Recovery Remaining to be Amortized				
1a	From Case No. 20xx-00xxx (Over)/Under-Recovery				
1b	From Case No. 20xx-00xxx (Over)/Under-Recovery				
1c	Total Previous (Over)/Under-Recovery				
2	Month-Year				
3	Month-Year				
4	Month-Year				
5	Month-Year				
6	Month-Year				
7	Month-Year				
Less Adjustment for Order amounts remaining to be amortized at end of review period (ending month)					
8		Amount Per Case Order Remaining to be Amortized at beginning of Review Period	Amortization of Previous (Over)/Under Recoveries During Review Period		Amount Per Case Order Remaining to be Amortized at end of Review Period
8a	Case No. 20xx-00xxx Recovery				
8b	Case No. 20xx-00xxx Recovery				
8c	Total Order amounts remaining - Over/(Under):				
9	Cumulative six month (Over)/Under-Recovery [Cumulative net of remaining Case amortizations]				
10	Monthly recovery (per month for six months)				
Reconciliation:					
11	Previous (Over)/Under-Recovery Remaining to be Amortized, beginning of Review Period				
12	Previous (Over)/Under-Recovery Remaining to be Amortized, ending of Review Period				
13	Total Amortization during Review Period				
14	(Over)/Under-Recovery from Column 5, Line 9				
15	Less: Total Monthly (Over)/Under-Recovery for Review Period (Column 4, Lines 2 thru 7)				
16	Difference				

Amortization Detail, Column 3, Line 8:

Month & Year	Case No. 20xx-00xxx	Case No. 20xx-00xxx
Month-Year	\$0	\$0
Month-Year	\$0	\$0
Month-Year	\$0	\$0
Month-Year	\$0	\$0
Month-Year	\$0	\$0
Month-Year	\$0	\$0
Totals	\$0	\$0

{Cooperative Name} - Calculation of (Over)/Under Recovery					
		EKPC Invoice Month recorded Member's Books	Billed to Retail Consumer & recorded on Member's Books	Monthly (Over) or Under	Cumulative (Over) or Under
Line No.	Month & Year	(2)	(3)	(4)	(5)
1	Previous (Over)/Under-Recovery Remaining to be Amortized				
1a	From Case No. 2014-00051 (Over)/Under-Recovery				\$658,068
1b	From Case No. 2015-00281 (Over)/Under-Recovery				\$91,062
1c	Total Previous (Over)/Under-Recovery				\$749,130
2	Jul-15	\$1,278,016	\$1,117,632	\$160,384	\$909,514
3	Aug-15	\$1,053,341	\$1,302,174	(\$248,833)	\$660,681
4	Sep-15	\$986,325	\$1,066,153	(\$79,828)	\$580,853
5	Oct-15	\$883,606	\$998,918	(\$115,312)	\$465,541
6	Nov-15	\$1,116,203	\$1,042,344	\$73,859	\$539,400
7	Dec-15	\$1,453,176	\$1,523,133	(\$69,957)	\$469,443
Less Adjustment for Order amounts remaining to be amortized at end of review period (ending month)					
8		Amount Per Case Order Remaining to be Amortized at beginning of Review Period	Amortization of Previous (Over)/Under Recoveries During Review Period		Amount Per Case Order Remaining to be Amortized at end of Review Period
8a	Case No. 2014-00051 Recovery	(\$658,068)	\$438,712		(\$219,356)
8b	Case No. 2015-00281 Recovery	(\$91,062)	\$0		(\$91,062)
8c	Total Order amounts remaining - Over/(Under):				(\$310,418)
9	Cumulative six month (Over)/Under-Recovery [Cumulative net of remaining Case amortizations]				\$159,025
10	Monthly recovery (per month for six months)				\$26,504
	Reconciliation:				
11	Previous (Over)/Under-Recovery Remaining to be Amortized, beginning of Review Period				\$749,130
12	Previous Over/(Under)-Recovery Remaining to be Amortized, ending of Review Period				(\$310,418)
13	Total Amortization during Review Period				\$438,712
14	(Over)/Under-Recovery from Column 5, Line 9				\$159,025
15	Less: Total Monthly (Over)/Under-Recovery for Review Period (Column 4, Lines 2 thru 7)				(\$279,687)
16	Difference				\$438,712

Amortization Detail, Column 3, Line 8:

Month & Year	Case No. 2014-00051	Case No. 2015-00281
Jul-15	\$0	\$0
Aug-15	\$0	\$0
Sep-15	(\$109,678)	\$0
Oct-15	(\$109,678)	\$0
Nov-15	(\$109,678)	\$0
Dec-15	(\$109,678)	\$0
Totals	(\$438,712)	\$0

**First Surcharge Review Period Using Alternative Methodology**

**Owen Electric Cooperative - Calculation of (Over)/Under Recovery**

Line No.	Month & Year	EKPC Invoice Month recorded Member's Books (2)	Billed to Retail Consumer & recorded on Member's Books (3)	Monthly (Over) or Under (4)	Cumulative (Over) or Under (5)
1	Previous (Over)/Under-Recovery Remaining to be Amortized				
1a	From Case No. 2014-00051 (Over)/Under-Recovery				(\$1,754,800)
1b	From Case No. 2015-00281 (Over)/Under-Recovery				(\$1,362,485)
1c	Total Previous (Over)/Under-Recovery				(\$3,117,285)
2	Jul-15	\$1,105,753	\$1,154,554	(\$48,801)	(\$3,166,086)
3	Aug-15	\$897,384	\$1,215,166	(\$317,782)	(\$3,483,868)
4	Sep-15	\$845,357	\$853,118	(\$7,761)	(\$3,491,629)
5	Oct-15	\$671,893	\$634,913	\$36,980	(\$3,454,649)
6	Nov-15	\$832,638	\$649,924	\$182,714	(\$3,271,935)
7	Dec-15	\$956,678	\$879,357	\$77,321	(\$3,194,614)
Less Adjustment for Order amounts remaining to be amortized at end of review period (ending month)					
8		Amount Per Case Order Remaining to be Amortized at beginning of Review Period	Amortization of Previous (Over)/Under Recoveries During Review Period		Amount Per Case Order Remaining to be Amortized at end of Review Period
8a	Case No. 2014-00051 Recovery	\$1,754,800	(\$438,699)		\$1,316,101
8b	Case No. 2015-00281 Recovery	\$1,362,485	\$0		\$1,362,485
8c	Total Order amounts remaining - Over/(Under):				\$2,678,586

9	Cumulative six month (Over)/Under-Recovery [Cumulative net of remaining Case amortizations]	(\$516,028)
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10	Monthly recovery (per month for six months)	(\$86,005)
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Reconciliation:		
11	Previous (Over)/Under-Recovery Remaining to be Amortized, beginning of Review Period	(\$3,117,285)
12	Previous Over/(Under)-Recovery Remaining to be Amortized, ending of Review Period	\$2,678,586
13	Total Amortization during Review Period	(\$438,699)
14	(Over)/Under-Recovery from Column 5, Line 9	(\$516,028)
15	Less: Total Monthly (Over)/Under-Recovery for Review Period (Column 4, Lines 2 thru 7)	(\$77,329)
16	Difference	(\$438,699)

**Amortization Detail, Column 3, Line 8:**

Month & Year	Case No. 2014-00051	Case No. 2015-00281
Jul-15	\$0	\$0
Aug-15	\$0	\$0
Sep-15	\$0	\$0
Oct-15	(\$146,233)	\$0
Nov-15	(\$146,233)	\$0
Dec-15	(\$146,233)	\$0
Totals	(\$438,699)	\$0

**First Surcharge Review Period Using Alternative Methodology**

**Owen Electric Cooperative - Calculation of (Over)/Under Recovery - Direct Surcharge Pass-Throughs**

**Nucor Steel Gallatin**

	EKPC Invoice Month recorded Member's Books	Billed to Retail Consumer & recorded on Member's Books	Monthly (Over) or Under	Cumulative (Over) or Under
Month & Year	(1)	(2)	(3)	(4)
Jul-15	\$456,899	\$456,899	\$0	\$0
Aug-15	\$445,236	\$445,236	\$0	\$0
Sep-15	\$422,945	\$422,945	\$0	\$0
Oct-15	\$345,964	\$345,964	\$0	\$0
Nov-15	\$527,810	\$527,810	\$0	\$0
Dec-15	\$580,699	\$580,699	\$0	\$0

Cumulative 6-month (Over)/Under Recovery	\$0
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Monthly Recovery (per month for six months)	\$0
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**Rate B Customers**

	EKPC Invoice Month recorded Member's Books	Billed to Retail Consumer & recorded on Member's Books	Monthly (Over) or Under	Cumulative (Over) or Under
Month & Year	(1)	(2)	(3)	(4)
Jul-15	\$209,213	\$209,213	\$0	\$0
Aug-15	\$181,436	\$181,436	\$0	\$0
Sep-15	\$180,128	\$180,128	\$0	\$0
Oct-15	\$177,290	\$177,290	\$0	\$0
Nov-15	\$190,937	\$190,937	\$0	\$0
Dec-15	\$209,557	\$209,557	\$0	\$0

Cumulative 6-month (Over)/Under Recovery	\$0
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Monthly Recovery (per month for six months)	\$0
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**Second Surcharge Review Period Using Alternative Methodology**

Owen Electric Cooperative - Calculation of (Over)/Under Recovery					
		EKPC Invoice Month recorded Member's Books	Billed to Retail Consumer & recorded on Member's Books	Monthly (Over) or Under	Cumulative (Over) or Under
Line No.	Month & Year	(2)	(3)	(4)	(5)
1	Previous (Over)/Under-Recovery Remaining to be Amortized				
1a	From Case No. 2014-00051 (Over)/Under-Recovery				(\$1,316,101)
1b	From Case No. 2015-00281 (Over)/Under-Recovery				(\$1,362,485)
1c	From First Review Using Alternative Methodology				(\$516,028)
1d	Total Previous (Over)/Under-Recovery				(\$3,194,614)
2	Jan-16	\$1,169,404	\$859,778	\$309,626	(\$2,884,988)
3	Feb-16	\$890,477	\$842,657	\$47,820	(\$2,837,168)
4	Mar-16	\$773,514	\$873,928	(\$100,414)	(\$2,937,582)
5	Apr-16	\$739,784	\$649,967	\$89,817	(\$2,847,765)
6	May-16	\$821,075	\$769,903	\$51,172	(\$2,796,593)
7	Jun-16	\$870,915	\$782,464	\$88,451	(\$2,708,142)
Less Adjustment for Order amounts remaining to be amortized at end of review period (ending month)					
8		Amount Per Case Order Remaining to be Amortized at beginning of Review Period	Amortization of Previous (Over)/Under Recoveries During Review Period		Amount Per Case Order Remaining to be Amortized at end of Review Period
8a	Case No. 2014-00051 Recovery	\$1,316,101	(\$877,398)		\$438,703
8b	Case No. 2015-00281 Recovery	\$1,362,485	(\$113,540)		\$1,248,945
8c	First Review Using Alt. Methodology	\$516,028	\$0		\$516,028
8d	Total Order amounts remaining - Over/(Under):				\$2,203,676
9	Cumulative six month (Over)/Under-Recovery		[Cumulative net of remaining Case amortizations]		(\$504,466)
10	Monthly recovery (per month for six months)				(\$84,078)
	Reconciliation:				
11	Previous (Over)/Under-Recovery Remaining to be Amortized, beginning of Review Period				(\$3,194,614)
12	Previous Over/(Under)-Recovery Remaining to be Amortized, ending of Review Period				\$2,203,676
13	Total Amortization during Review Period				(\$990,938)
14	(Over)/Under-Recovery from Column 5, Line 9				(\$504,466)
15	Less: Total Monthly (Over)/Under-Recovery for Review Period (Column 4, Lines 2 thru 7)				\$486,472
16	Difference				(\$990,938)

Amortization Detail, Column 3, Line 8:

Month & Year	Case No. 2014-00051	Case No. 2015-00281	First Review
Jan-16	(\$146,233)	\$0	\$0
Feb-16	(\$146,233)	\$0	\$0
Mar-16	(\$146,233)	\$0	\$0
Apr-16	(\$146,233)	\$0	\$0
May-16	(\$146,233)	\$0	\$0
Jun-16	(\$146,233)	(\$113,540)	\$0
Totals	(\$877,398)	(\$113,540)	\$0

Assuming first amortization month for Case No. 2015-00281 is June 2016

**Columns 2 and 3, lines 2 thru 7 - Dollar values on this page are for illustrative purposes only and may not reflect actual results.**

**Second Surcharge Review Period Using Alternative Methodology**

**Owen Electric Cooperative - Calculation of (Over)/Under Recovery - Direct Surcharge Pass-Throughs**

**Nucor Steel Gallatin**

	EKPC Invoice Month recorded Member's Books	Billed to Retail Consumer & recorded on Member's Books	Monthly (Over) or Under	Cumulative (Over) or Under
Month & Year	(1)	(2)	(3)	(4)
Jan-16	\$506,755	\$506,755	\$0	\$0
Feb-16	\$486,400	\$486,400	\$0	\$0
Mar-16	\$337,890	\$337,890	\$0	\$0
Apr-16	\$329,722	\$329,722	\$0	\$0
May-16	\$498,338	\$498,338	\$0	\$0
Jun-16	\$417,262	\$417,262	\$0	\$0

Cumulative 6-month (Over)/Under Recovery	\$0
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Monthly Recovery (per month for six months)	\$0
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**Rate B Customers**

	EKPC Invoice Month recorded Member's Books	Billed to Retail Consumer & recorded on Member's Books	Monthly (Over) or Under	Cumulative (Over) or Under
Month & Year	(1)	(2)	(3)	(4)
Jan-16	\$204,904	\$204,904	\$0	\$0
Feb-16	\$174,728	\$174,728	\$0	\$0
Mar-16	\$189,013	\$189,013	\$0	\$0
Apr-16	\$189,781	\$189,781	\$0	\$0
May-16	\$190,400	\$190,400	\$0	\$0
Jun-16	\$203,688	\$203,688	\$0	\$0

Cumulative 6-month (Over)/Under Recovery	\$0
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Monthly Recovery (per month for six months)	\$0
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***Dollar values on this page are for illustrative purposes only and may not reflect actual results.***

**Third Surcharge Review Period Using Alternative Methodology**

**Owen Electric Cooperative - Calculation of (Over)/Under Recovery**

Line No.	Month & Year	EKPC Invoice Month recorded Member's Books (2)	Billed to Retail Consumer & recorded on Member's Books (3)	Monthly (Over) or Under (4)	Cumulative (Over) or Under (5)
1	Previous (Over)/Under-Recovery Remaining to be Amortized				
1a	From Case No. 2014-00051 (Over)/Under-Recovery				(\$438,703)
1b	From Case No. 2015-00281 (Over)/Under-Recovery				(\$1,248,945)
1c	From First Review Using Alternative Methodology				(\$516,028)
1d	From Second Review Using Alternative Methodology				(\$504,466)
1e	Total Previous (Over)/Under-Recovery				(\$2,708,142)
2	Jul-16	\$969,651	\$888,983	\$80,668	(\$2,627,474)
3	Aug-16	\$865,470	\$889,420	(\$23,950)	(\$2,651,424)
4	Sep-16	\$790,628	\$728,976	\$61,652	(\$2,589,773)
5	Oct-16	\$664,513	\$708,562	(\$44,049)	(\$2,633,822)
6	Nov-16	\$842,815	\$713,322	\$129,493	(\$2,504,329)
7	Dec-16	\$919,557	\$821,601	\$97,956	(\$2,406,373)
Less Adjustment for Order amounts remaining to be amortized at end of review period (ending month)					
8		Amount Per Case Order Remaining to be Amortized at beginning of Review Period	Amortization of Previous (Over)/Under Recoveries During Review Period		Amount Per Case Order Remaining to be Amortized at end of Review Period
8a	Case No. 2014-00051 Recovery	\$438,703	(\$438,703)		\$0
8b	Case No. 2015-00281 Recovery	\$1,248,945	(\$681,240)		\$567,705
8c	First Review Using Alt. Methodology	\$516,028	(\$172,009)		\$344,019
8d	Second Review Using Alt. Method.	\$504,466	\$0		\$504,466
8e	Total Order amounts remaining - Over/(Under):				\$1,416,190

9	Cumulative six month (Over)/Under-Recovery	(Cumulative net of remaining Case amortizations)	(\$990,183)
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10	Monthly recovery (per month for six months)	(\$165,031)
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Reconciliation:		
11	Previous (Over)/Under-Recovery Remaining to be Amortized, beginning of Review Period	(\$2,708,142)
12	Previous Over/(Under)-Recovery Remaining to be Amortized, ending of Review Period	\$1,416,190
13	Total Amortization during Review Period	(\$1,291,952)
14	(Over)/Under-Recovery from Column 5, Line 9	(\$990,183)
15	Less: Total Monthly (Over)/Under-Recovery for Review Period (Column 4, Lines 2 thru 7)	\$301,769
16	Difference	(\$1,291,952)

Amortization Detail, Column 3, Line 8:

Month & Year	Case No. 2014-00051	Case No. 2015-00281	First Review	Second Review
Jul-16	(\$146,233)	(\$113,540)	\$0	\$0
Aug-16	(\$146,233)	(\$113,540)	\$0	\$0
Sep-16	(\$146,237)	(\$113,540)	\$0	\$0
Oct-16	\$0	(\$113,540)	\$0	\$0
Nov-16	\$0	(\$113,540)	(\$86,005)	\$0
Dec-16	\$0	(\$113,540)	(\$86,005)	\$0
Totals	(\$438,703)	(\$681,240)	(\$172,009)	\$0

Assuming first amortization month for First Review is November 2016

**Columns 2 and 3, lines 2 thru 7 - Dollar values on this page are for illustrative purposes only and may not reflect actual results.**

**Please note that the stated monthly amortization for Case No. 2014-00051 does not result in a zero balance at the end of the amortization period; the last monthly amount has been adjusted to produce a zero balance.**



**Third Surcharge Review Period Using Alternative Methodology**

**Owen Electric Cooperative - Calculation of (Over)/Under Recovery - Direct Surcharge Pass-Throughs**

**Nucor Steel Gallatin**

	EKPC Invoice Month recorded Member's Books	Billed to Retail Consumer & recorded on Member's Books	Monthly (Over) or Under	Cumulative (Over) or Under
Month & Year	(1)	(2)	(3)	(4)
Jul-16	\$355,862	\$355,862	\$0	\$0
Aug-16	\$352,775	\$352,775	\$0	\$0
Sep-16	\$343,085	\$343,085	\$0	\$0
Oct-16	\$307,808	\$307,808	\$0	\$0
Nov-16	\$428,554	\$428,554	\$0	\$0
Dec-16	\$373,765	\$373,765	\$0	\$0

Cumulative 6-month (Over)/Under Recovery	\$0
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Monthly Recovery (per month for six months)	\$0
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**Rate B Customers**

	EKPC Invoice Month recorded Member's Books	Billed to Retail Consumer & recorded on Member's Books	Monthly (Over) or Under	Cumulative (Over) or Under
Month & Year	(1)	(2)	(3)	(4)
Jul-16	\$195,134	\$195,134	\$0	\$0
Aug-16	\$206,524	\$206,524	\$0	\$0
Sep-16	\$192,527	\$192,527	\$0	\$0
Oct-16	\$206,245	\$206,245	\$0	\$0
Nov-16	\$195,370	\$195,370	\$0	\$0
Dec-16	\$211,622	\$211,622	\$0	\$0

Cumulative 6-month (Over)/Under Recovery	\$0
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Monthly Recovery (per month for six months)	\$0
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***Dollar values on this page are for illustrative purposes only and may not reflect actual results.***

**COMMONWEALTH OF KENTUCKY**  
**BEFORE THE 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 TO SUBMIT CASE FOR ADJUDICATION  
ON THE ADMINISTRATIVE 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") to submit the case for a decision based upon the existing record and without the need for a hearing, 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. 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

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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).

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.

On December 22, 2015 EKPC and its Members filed a motion requesting an extension until January 29, 2016 in which to either request a hearing or submit the case on the record. In the motion, EKPC stated that the Members have been considering alternative methodologies while this case has been proceeding, and EKPC has been supportive of those efforts. EKPC further stated that recently an alternative methodology had been suggested which could be acceptable to all the Members but additional time was needed for the Members to consider and evaluate this 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 believed it was reasonable to request that the December 30, 2015 deadline be extended to allow for this evaluation. The Commission granted the requested extension on December 28, 2015.

The Members completed their review and evaluation of the alternative methodology and unanimously concluded that it was a reasonable solution to the over- and under-recovery determination issue in the surcharge review periods. In a filing made on January 28, 2016, EKPC filed a motion seeking to amend the procedural schedule to file supplemental testimony explaining the alternative methodology, requesting an informal conference and asking for an appropriate extension of the procedural schedule. That motion was granted on February 18, 2016 and an informal conference was held on March 2, 2016. In the course of the informal conference, EKPC agreed to provide an illustration of the proposed methodology as it would apply to Owen Electric

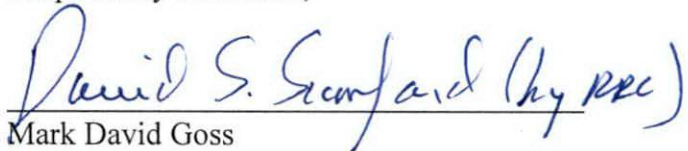
and to also provide an updated Exhibit ISS – 1. In addition, Farmers RECC indicated that it would be filing a supplemental data request response to request reversion of its original twelve month amortization request to a six month amortization request. Farmers RECC has since filed its supplemental data request response and, contemporaneous with this filing, EKPC is tendering its Owen Electric illustration and an updated Exhibit ISS – 1.

With these filings, the administrative record is complete and it would be appropriate for the Commission to make a ruling based upon the record. EKPC and its Members are eager to adopt the alternative methodology and respectfully request a decision from the Commission at its earliest opportunity.

WHEREFORE, EKPC and its Members move the Commission to submit the case on the existing administrative record.

This 15<sup>th</sup> day of March, 2016.

Respectfully submitted,



Mark David Goss  
David S. Samford  
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Lexington, KY 40504  
(859) 368-7740  
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david@gosssamfordlaw.com

*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 15<sup>th</sup> day of March, 2016, addressed to the following:

David Estep  
President & General Manager  
Big Sandy R.E.C.C.  
504 11<sup>th</sup> Street  
Paintsville, KY 41240-1422

Donald Smothers  
Blue Grass Energy Cooperative Corp.  
1201 Lexington Road  
P. O. Box 990  
Nicholasville, KY 40340-0990

Chris Brewer  
President & CEO  
Clark Energy Cooperative, Inc.  
2640 Ironworks Road  
P. O. Box 748  
Winchester, KY 40392-0748

Ted Hampton  
Manager  
Cumberland Valley Electric, Inc.  
Highway 25E  
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