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November 25, 2015

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PUBLIC SERVICE
COMMISSION

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: The Application of East Kentucky Power Cooperative, Inc.
For Deviation from Obligation Resulting from Case No. 2012-00169
PSC Case No. 2015-00358

Dear Mr. Derouen:

Enclosed please find for filing with the Commission in the above-referenced case an original and ten (10) copies of the Motion to Hold Case in Abeyance. Please return a file-stamped copy to me.

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

Very truly yours,

Mark David Goss

Enclosures

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

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PUBLIC SERVICE
COMMISSION

IN THE MATTER OF:

APPLICATION OF EAST KENTUCKY POWER)
COOPERATIVE, INC. FOR DEVIATION FROM) CASE NO.
OBLIGATION RESULTING FROM CASE NO.) 2015-00358
2012-00169)

**EAST KENTUCKY POWER COOPERATIVE, INC.'S
MOTION TO HOLD CASE IN ABEYANCE**

Comes now East Kentucky Power Cooperative, Inc. ("EKPC"), by counsel, and moves the Kentucky Public Service Commission ("Commission") for an Order holding this case in abeyance for a period of ninety (90) days. In support of this Motion, EKPC states as follows:

1. In its Application filed herein on October 30, 2015, EKPC requested relief from an obligation contained in the Commission's Order entered December 20, 2012, in Case No. 2012-00169 (the "PJM Integration Order").¹ Among other things, the PJM Integration Order requires EKPC to file, "no later than November 30, 2015, an application for approval of a rate mechanism to flow back to customers the capacity market benefits expected to accrue from membership in PJM."² It is the obligation to file for approval of the rate mechanism by November 30, 2015, that is the subject of the instant case.

2. EKPC, Kentucky Industrial Utility Customers, Inc. ("KIUC"), the Attorney General of the Commonwealth of Kentucky (the "AG") (EKPC, KIUC, and the AG are referred

¹ *In the Matter of the Application of East Kentucky Power Cooperative, Inc. to Transfer Functional Control of Certain Transmission Facilities to PJM Interconnection, LLC* (Ky. P.S.C. Dec. 20, 2012).

² *Id.* at p. 20.

to herein as the “Parties”), and Commission Staff participated in an Informal Conference related to this case on November 20, 2015. At the Informal Conference, the Parties and Commission Staff discussed the issues in this matter and possible resolution of the case. Discussions among the Parties are ongoing.

3. In order for the Parties to further discuss the resolution of this matter, and specifically to allow the Parties an opportunity to develop a mutually-agreeable proposal related to the structure and implementation of the capacity benefits mechanism required by the PJM Integration Order, EKPC requests that this case be held in abeyance for a period of ninety (90) days. Further, EKPC requests that the Commission temporarily suspend during this period of abeyance EKPC’s obligation to file the capacity benefits mechanism.

4. KIUC has advised EKPC that it supports the relief requested in this Motion. The AG has taken no position.

5. In light of the recent good-faith discussions of the Parties and the reasonable nature of the abeyance and temporary suspension described herein, good cause exists to grant EKPC’s requested relief.

WHEREFORE, EKPC respectfully requests that the Commission enter an Order:

1. Holding this matter in abeyance for a period of ninety (90) days;
2. Temporarily relieving EKPC of the PJM Integration Order’s requirement regarding the filing of a capacity benefits mechanism;
3. Requiring that, at the end of the ninety (90) day abeyance period, EKPC file in this docket a written summary of the status of their discussions and progress made to date; and
4. Granting all other relief to which EKPC may appear entitled.

This 25th day of November, 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 has been served, by delivering same to the custody and care of the U.S. Postal Service, postage pre-paid, this 25th day of November, 2015, addressed to the following:

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