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March 30, 2017

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PUBLIC SERVICE
COMMISSION

VIA HAND DELIVERY

Dr. Talina Mathews
Executive Director
Kentucky Public Service Commission
P.O. Box 615
211 Sower Boulevard
Frankfort, KY 40602

Re: AN EXAMINATION OF THE APPLICATION OF THE FUEL ADJUSTMENT
CLAUSE OF JACKSON PURCHASE ENERGY CORPORATION FROM
NOVEMBER 1, 2014 THROUGH OCTOBER 31, 2016
Case No. 2017-00023

Dr. Mathews:

On behalf of Jackson Purchase Energy Corporation ("JPEC"), please find enclosed and accept for filing in the above-styled matter an original and six (6) copies of JPEC's Response to the Requests for Information contained in the Commission's Order entered February 6, 2017, as well as an original and ten (10) copies of JPEC's Motion for Leave to Deviate from said Order. Please return file-stamped copies of each of these filings to me.

I appreciate your assistance with this matter, and please do not hesitate to contact me with any questions or concerns.

Respectfully,



M. Evan Buckley

Enclosures

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

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IN THE MATTER OF:

PUBLIC SERVICE
COMMISSION

AN EXAMINATION OF THE APPLICATION)
OF THE FUEL ADJUSTMENT CLAUSE OF)
JACKSON PURCHASE ENERGY CORPORATION)
FROM NOVEMBER 1, 2014 THROUGH)
OCTOBER 31, 2016)

CASE NO. 2017-00023

**MOTION FOR LEAVE TO DEVIATE
FROM COMMISSION ORDER**

Comes now Jackson Purchase Energy Corporation (“JPEC”), by counsel, and hereby moves the Commission for leave to deviate from certain deadlines set forth in the Order entered herein on February 6, 2017 (the “Order”). In support of this request, JPEC states as follows:

1. The Commission established this proceeding pursuant to the Order, wherein it directed JPEC to file, *inter alia*, an Affidavit of Compliance by February 27, 2017, and responses to certain requests for information by March 8, 2017.
2. Through oversight, inadvertence, and/or excusable neglect, JPEC failed to comply with the Commission’s stated deadlines. Instead, JPEC filed an affidavit attesting to its compliance with the requirements of 807 KAR 5:056 on March 10, 2017, and files its responses to the relevant requests for information contemporaneously with this Motion.
3. While personnel changes and internal misunderstanding contributed to JPEC’s delinquencies in this case, JPEC states affirmatively that it has implemented appropriate measures to better ensure compliance with Commission directives. To that end, JPEC has already arranged

for publication of notice consistent with paragraph 4 of the Commission's Order and fully intends to file an Affidavit of Publication of Hearing with the Commission on or before April 17, 2017.

4. JPEC respectfully requests that the Commission accept its late-filed Affidavit of Compliance and its late-filed responses to the Commission's requests for information. Due to the scope and subject matter of this proceeding, as well as the time remaining before the scheduled hearing in this proceeding (April 17, 2017), JPEC does not believe the deviation it requests will result in prejudice or unreasonably impact the Commission's consideration of relevant issues. JPEC endeavors to ensure the timely progression of this case going forward and hopes to avoid any delay in concluding the Commission's examination.

WHEREFORE, for good cause shown, JPEC respectfully requests that the Commission enter an Order granting JPEC permission to late-file the documents described herein and thereby deviate from the deadlines set forth in the Commission's Order entered herein on February 6, 2017.

Dated this 30th day of March, 2017.

Respectfully submitted,



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