

**Goss  
Samford**

ATTORNEYS AT LAW | PLLC

**David S. Samford**  
(859) 368-7740  
david@gosssamfordlaw.com

May 22, 2017

**VIA HAND DELIVERY**

**RECEIVED**

**MAY 22 2017**

**PUBLIC SERVICE  
COMMISSION**

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

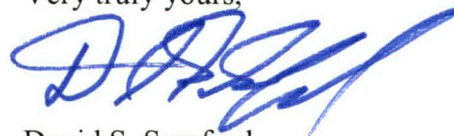
Re: In the Matter of an Examination by the Public Service Commission of the Environmental Surcharge Mechanism of East Kentucky Power Cooperative, Inc., for the Six-Month Billing Periods Ending December 21, 2016, and the Pass Through Mechanism for its Sixteen Member Distribution Cooperatives - Case No. 2017-00071

Dear Dr. Mathews:

Enclosed, please find for filing with the Commission in the above-referenced case an original and ten copies of a Motion to Submit Case for Adjudication on the Administrative Record.

Please return a file-stamped copy of this filing to my office.

Very truly yours,



David S. Samford

Enclosures

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

**In the Matter of:**

<b>AN EXAMINATION BY THE PUBLIC SERVICE</b>	)	
<b>COMMISSION OF THE ENVIRONMENTAL</b>	)	
<b>SURCHARGE MECHANISM OF EAST KENTUCKY</b>	)	
<b>POWER COOPERATIVE, INC. FOR THE SIX-</b>	)	<b>CASE NO.</b>
<b>MONTH BILLING PERIODS ENDING DECEMBER</b>	)	<b>2017-00071</b>
<b>31, 2016 AND THE PASS THROUGH MECHANISM</b>	)	
<b>FOR ITS SIXTEEN MEMBER DISTRIBUTION</b>	)	
<b>COOPERATIVES</b>	)	

---

**MOTION TO SUBMIT CASE FOR ADJUDICATION  
ON THE ADMINISTRATIVE RECORD**

---

Comes now East Kentucky Power Cooperative, Inc. (“EKPC”), by counsel, and, for itself 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:

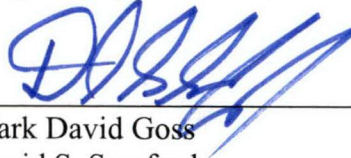
On February 21, 2017, the Commission issued an Order opening an investigation for the six-month review of EKPC’s environmental surcharge and pass-through mechanisms. The February 21, 2017 Order contained a procedural schedule which allowed for the filing of direct testimony, data requests and a deadline for motions to intervene in the case. EKPC and its Members have provided all of the requested information and there have been no motions for intervention filed in this case. EKPC and its Members have until June 27, 2017, to request a hearing or submit the case for a decision on the existing record.

Since the remainder of the procedural schedule only applies to intervenors, and there are no intervenors in this case, EKPC and its Members believe 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 respectfully request a decision from the Commission based upon the existing record.

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

This 22<sup>nd</sup> day of May, 2017.

Respectfully submitted,



---

Mark David Goss  
David S. Samford  
GOSS SAMFORD, PLLC  
2365 Harrodsburg Road, Suite B325  
Lexington, KY 40504  
(859) 368-7740  
mdgoss@gosssamfordlaw.com  
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 22<sup>nd</sup> day of May, 2017 addressed to the following:

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

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

Bill T. Prather  
President & CEO  
Farmers R.E.C.C.  
504 South Broadway  
P. O. Box 1298  
Glasgow, KY 42141-1298

Carol Ann Fraley  
President & CEO  
Grayson R.E.C.C.  
109 Bagby Park  
Grayson, KY 41143

Carol Wright  
President & CEO  
Jackson Energy Cooperative Corporation  
115 Jackson Energy Lane  
McKee, KY 40447

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

Ted Hampton  
Manager  
Cumberland Valley Electric, Inc.  
Highway 25E  
P. O. Box 440  
Gray, KY 40734

Joni K. Hazelrigg  
President & CEO  
Fleming-Mason Energy Cooperative, Inc.  
1449 Elizaville Road  
P. O. Box 328  
Flemingsburg, KY 41041

James L. Jacobus  
President & CEO  
Inter-County Energy Cooperative Corp.  
1009 Hustonville Road  
P. O. Box 87  
Danville, KY 40423-0087

Kerry K. Howard  
CEO  
Licking Valley R.E.C.C.  
P. O. Box 605  
271 Main Street  
West Liberty, KY 41472

Michael L. Miller  
President & CEO  
Nolin R.E.C.C.  
411 Ring Road  
Elizabethtown, KY 42701-6767

Tim Sharp  
President & CEO  
Salt River Electric Cooperative Corp.  
111 West Brashear Avenue  
P. O. Box 609  
Bardstown, KY 40004

Allen Anderson  
President & CEO  
South Kentucky R.E.C.C.  
925-929 North Main Street  
P. O. Box 910  
Somerset, KY 42502-0910

Mark Stallons  
President & CEO  
Owen Electric Cooperative, Inc.  
8205 Highway 127 North  
P. O. Box 400  
Owenton, KY 40359

Debbie J. Martin  
President & CEO  
Shelby Energy Cooperative, Inc.  
620 Old Finchville Road  
Shelbyville, KY 40065

Barry L. Myers  
Manager  
Taylor County R.E.C.C.  
625 West Main Street  
P. O. Box 100  
Campbellsville, KY 42719



---

*Counsel for East Kentucky Power Cooperative, Inc.*