

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

April 28, 2017

RECEIVED

Via Hand Delivery

APR 2 8 2017

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

Re:

In the Matter of the Application of East Kentucky Power Cooperative, Inc. for a Declaratory Order Concerning a Transmission Line Relocation Project

Case No. 2017-00100

Dear Dr. Mathews:

Please find enclosed for filing with the Commission one original and ten copies of East Kentucky Power Cooperative, Inc.'s ("EKPC") Motion to Submit for a Decision on the Existing Record in the above-styled case. Please return a file-stamped copy to me.

Please do not hesitate to contact me if you have any questions or concerns.

Sincerely.

David S. Samford

Enclosures

COMMONWEALTH OF KENTUCKY

RECEIVED

BEFORE THE PUBLIC SERVICE COMMISSION

APR 28 2017

PUBLIC SERVICE COMMISSION

IN THE MATTER OF:

THE APPLICATION OF EAST KENTUCKY)	
POWER COOPERATIVE, INC. FOR A)	
DECLARATORY ORDER CONCERNING)	Case No. 2017-00100
A TRANSMISSION LINE RELOCATION)	
PROJECT)	

MOTION TO SUBMIT FOR A DECISION ON THE EXISTING RECORD

Comes now East Kentucky Power Cooperative, Inc. ("EKPC"), by counsel, and moves the Kentucky Public Service Commission ("Commission") to submit the above-styled case for a decision on the merits based upon the existing record. In support of this Motion, EKPC respectfully states that the procedural deadlines from the Commission's March 29, 2017 Scheduling Order have passed. There are no intervenors in the case. Accordingly, the administrative record appears to be complete and the case may be submitted to the Commission for a final decision on the merits based upon the existing administrative record. EKPC hereby waives its right to a hearing so that a decision may be given at the Commission's earliest opportunity.

WHEREFORE, EKPC respectfully requests that the Commission take the case under submission and issue a final Order regarding same based upon the existing administrative record.

This 28th day of April, 2017.

Respectfully submitted,

Mark David Goss
David S. Samford
M. Evan Buckley
GOSS SAMFORD, PLLC
2365 Harrodsburg Road, Suite B325
Lexington, KY 40504
(859) 368-7740
mdgoss@gosssamfordlaw.com
david@gosssamfordlaw.com
ebuckley@gosssamfordlaw.com

Counsel for East Kentucky Power Cooperative, Inc.