

**Goss
Samford**

ATTORNEYS AT LAW | PLLC

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

RECEIVED

NOV 30 2017

PUBLIC SERVICE
COMMISSION

November 29, 2017

Ms. Gwen Pinson
Executive Director
Public Service Commission
211 Sower Boulevard
Frankfort, Kentucky 40602

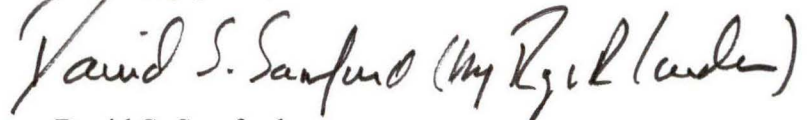
Re: PSC Case No. 2017-00326

Dear Ms. Pinson:

Please find enclosed for filing with the Commission in the above-referenced case, an original and eight copies of the Motion of East Kentucky Power Cooperative, Inc., ("EKPC") to submit the case for adjudication on the administrative record.

Please return a file-stamped copy to my office.

Very truly yours,

A handwritten signature in black ink that reads "David S. Samford (My Reg. L. Under)". The signature is written in a cursive style.

David S. Samford

Enclosures

RECEIVED

NOV 30 2017

PUBLIC SERVICE
COMMISSION

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

In the Matter of:

AN EXAMINATION BY THE PUBLIC SERVICE)	
COMMISSION OF THE ENVIRONMENTAL)	
SURCHARGE MECHANISM OF EAST)	
KENTUCKY POWER COOPERATIVE, INC.)	CASE NO.
FOR THE TWO-YEAR BILLING PERIOD)	2017-00326
ENDING JUNE 30, 2017 AND THE PASS-)	
THROUGH MECHANISM FOR ITS SIXTEEN)	
MEMBER DISTRIBUTION COOPERATIVES)	

**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 August 31, 2017, the Commission issued an Order opening an investigation for the two-year review of EKPC's environmental surcharge and pass-through mechanisms. The August 31, 2017 Order contained a procedural schedule that 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 January 3, 2018, to request a hearing or submit the case for a decision on the existing record.

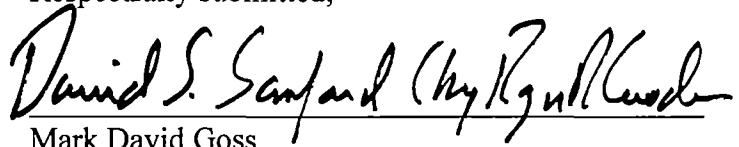
Since the remainder of the procedural schedule only applies to intervenors, and there are no intervenors in this case, EKPC and its Members believe the administrative record is complete

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 29th day of November, 2017

Respectfully submitted,

A handwritten signature in black ink that reads "David S. Samford (by Mark David Goss)". The signature is written in a cursive style and is positioned above a horizontal line.

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 deposited in the custody and care of the U.S. Mail, postage prepaid, on this the 24th day of November 2017, addressed to the following:

Dennis Holt
President & CEO
South Kentucky R.E.C.C.
925-929 N Main Street
P. O. Box 910
Somerset, KY 42502-0910

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

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

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

Bobby Sexton
President & General Manager
Big Sandy R.E.C.C.
504 11th Street
Paintsville, KY 41240-1422

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

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

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

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

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

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

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

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

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

Charles G. Williamson III, CPA
Blue Grass Energy Cooperative Corp.
1201 Lexington Road
P. O. Box 990
Nicholasville, KY 40340-0990

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


David S. Sanford (By Reg. R. Lusk)
Counsel for East Kentucky Power Cooperative