

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 APPROVAL TO AMEND ITS )  
ENVIRONMENTAL COMPLIANCE PLAN AND )  
RECOVER COSTS PURSUANT TO ITS ) CASE No.  
ENVIRONMENTAL SURCHARGE, SETTLEMENT ) 2017-00376  
OF CERTAIN ASSET RETIREMENT OBLIGATIONS )  
AND ISSUANCE OF A CERTIFICATE OF PUBLIC )  
CONVENIENCE AND NECESSITY AND OTHER RELIEF )

**ATTORNEY GENERAL'S MEMORANDUM IN SUPPORT OF MOTION  
FOR INTERVENTION OUT-OF-TIME**

Comes now the Attorney General of the Commonwealth of Kentucky, by and through his Office of Rate Intervention, and states as follows for his Memorandum in Support of his Motion to Intervene Out-of-Time in the above-styled action.

On December 14, 2017 the Commission issued its procedural schedule in this action. That schedule set a deadline of December 22, 2017 for the filing of any motions to intervene. The Attorney General's Office of Rate Intervention has been extensively involved in several base rate, and multiple other cases currently pending before the Commission, which has caused counsel to miss the deadline for intervention in this case. The Attorney General respectfully requests that the Commission grant his motion to intervene, and if granted, he will accept and abide by the procedural schedule as it now stands.

WHEREFORE, the Attorney General respectfully requests that the Commission grant his motion to intervene.

Respectfully submitted,

ANDY BESHEAR  
ATTORNEY GENERAL



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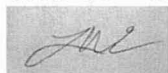
*Certificate of Service and Filing*

Counsel certifies that an original and ten photocopies of the foregoing were served and filed by hand delivery to Ms. Gwen R. Pinson, Executive Director, Public Service Commission, 211 Sower Boulevard, Frankfort, Kentucky 40601; counsel further states that true and accurate copies of the foregoing were mailed via First Class U.S. Mail, postage pre-paid, to:

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Goss Samford, PLLC  
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East Kentucky Power Cooperative, Inc.  
4775 Lexington Road  
P. O. Box 707  
Winchester, KY 40392-070

This 18<sup>th</sup> day of January, 2018.



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Assistant Attorney General