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February 21, 2018

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FEB 2 1 2018

PUBLIC SERVICE COMMISSION

Ms. Gwen R. Pinson, **Executive Director** Kentucky Public Service Commission 211 Sower Boulevard P.O. Box 615 Frankfort, KY 40602-0615

> In the Matter of: Re:

The Application of South Kentucky Rural Electric Cooperative Corporation For Approval of Master Power Purchase And Sale Agreement and Transactions Thereunder

Case No. 2018-00050

Dear Ms. Pinson:

Enclosed please find an original and ten (10) copies of Cumberland Valley Electric, Inc.'s Motion to Intervene in the above referenced matter.

Should you have any questions or need additional information, please contact my office at 606-546-3811, phauser@barbourville.com.

Respectfully submitted,

WPH/dd

**Enclosures** 

Cc:

Mr. Ted Hampton

Cumberland Valley Electric, Inc.

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PUBLIC SERVICE COMMISSION

# COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

THE APPLICATION OF SOUTH KENTUCKY RURAL	)	
ELECTRIC COOPERATIVE CORPORATION FOR	)	Case No. 2018-00050
APPROVAL OF MASTER POWER PURCHASE AND	)	
SALE AGREEMENT AND TRANSACTIONS THEREUNDER	)	

## MOTION TO INTERVENE BY CUMBERLAND VALLEY ELECTRIC, INC.

Pursuant to K.R.S. §278.310 and 807 KAR 5:001, Section 4(11), Cumberland Valley Electric, Inc. ("CVE"), requests that it be granted full intervenor status in the above-captioned proceeding and states in support thereof as follows:

- CVE is a not-for-profit, member-owned rural electric distribution cooperative organized under KRS Chapter 279. CVE is incorporated in the Commonwealth of Kentucky, and attests that it is presently a Kentucky corporation in good standing.
- 2. CVE is engaged in the business of distributing retail electric power to approximately 23,600 members located in the counties of Bell, Harlan, Knox, Laurel, Leslie, Letcher, McCreary and Whitley. CVE is one (1) of sixteen (16) owners-members of East Kentucky Power Cooperative, Inc. ("EKPC"). CVE and

<sup>&</sup>lt;sup>1</sup> CVE's sister cooperatives are: South Kentucky Rural Electric Cooperative Corporation; Big Sandy Rural Electric Cooperative Corporation; Blue Grass Energy Cooperative Corporation; Clark Energy Cooperative, Inc.; Owen Electric Cooperative, Inc.; Farmers Rural Electric Cooperative Corporation; Fleming-Mason Energy Cooperative, Inc.; Grayson Rural Electric Cooperative Corporation; Inter-County Energy Cooperative Corporation; Jackson Energy Cooperative Corporation; Licking Valley Rural Electric Cooperative Corporation; Nolin Rural Electric Cooperative Corporation; Salt River Electric Cooperative Corporation; Shelby Energy Cooperative, Inc.; and Taylor County Rural Electric Cooperative Corporation.

EKPC (as well as each other Owner-Member distribution cooperative and EKPC, respectively) have entered into the Wholesale Power Contract dated October 1, 1964, Amendment No. 3 and the Memorandum of Understanding and Agreement regarding Alternate Power Sources all as referenced in South Kentucky Rural Electric Cooperative Corporation's Application in the above captioned proceeding.

3. The matters being decided by the Commission in this case will have a significant impact on the rates paid by CVE and its members for electricity. The attorney for CVE authorized to represent it in this proceeding and to take service of all documents is:

> Hon. W. Patrick Hauser W. Patrick Hauser, P.S.C. P.O. Box 1900 Barbourville, Kentucky 40906

Phone: Facsimile:

606-546-3811 606-546-3050

Email:

phauser@barbourville.com

4. The position of CVE and its members cannot be adequately represented by any existing party. CVE intends to play a constructive role in the Commission's decision-making process herein and CVE's participation will not unduly prejudice any party.

**WHEREFORE,** CVE requests that it be granted full intervenor status in the above captioned proceedings.

Respectfully submitted,

W. PATRICK HAUSER

P.O. Box 1900

Barbourville, Kentucky 40906

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COUNSEL FOR CUMBERLAND VALLEY ELECTRIC, INC.