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PUBLIC SERVICE COMMISSION

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February 23, 2018

Hand-Delivered

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

RE:

Owen Electric Cooperative, Inc.

Case No. 2018-00050

Dear Ms. Pinson:

Please find enclosed the original and ten (10) copies of "Motion to Intervene of Owen Electric Cooperative, Inc.".

Respectfully yours,

CRAWFORD & BAXTER, P.S.C.

James M. Crawford
Counsel for Owen Electric Cooperative, Inc.

JMC/mns

Enclosure

FEB 2 2 2018

COMMONWEALTH OF KENTUCKY

PUBLIC SERVICE COMMISSION

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 OF OWEN ELECTRIC COOPERATIVE, INC.

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

- 1. OEC is a not-for-profit, member-owned rural electric distribution cooperative organized under KRS Chapter 279. OEC is incorporated in the Commonwealth of Kentucky, and attests that it is presently a Kentucky corporation in good standing.
- 2. OEC is engaged in the business of distributing retail electric power to approximately 61,000 members located in the counties of Owen, Carroll, Gallatin, Boone, Campbell, Kenton, Pendleton, Grant and Scott. OEC is one (1) of sixteen (16) owners-members of East Kentucky Power Cooperative, Inc. ("EKPC").1 OEC and EKPC (as well as each other Owner-

¹OEC'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.; Cumberland Valley Electric, 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.

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 OEC and its members for electricity. The attorneys for OEC authorized to represent them in this proceeding and to take service of all documents are:

James M. Crawford, Esq. Ruth H. Baxter, Esq. Jake A. Thompson, Esq. CRAWFORD & BAXTER, P.S.C. 523 Highland Avenue P.O. Box 353 Carrollton, Kentucky 41008 Phone: (502) 732-6688

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

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

Respectfully Submitted,

mes M. Crawford, Esq.

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COUNSEL FOR OWEN ELECTRIC COOPERATIVE, INC.

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the above Motion to Intervene was served by U. S. Mail to all parties on the 23rd day of February, 2018, to the following:

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

Hon. Mark David Goss Hon. M. Evan Buckley Goss Samford, PLLC 2365 Harrodsburg Road, Suite B325 Lexington, Kentucky 40504

South Kentucky R.E.C.C. 925-929 N. Main Street P.O. Box 910 Somerset, Kentucky 42502-0910

Hon. James M. Crawford

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