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FEB 2 3 2018

PUBLIC SERVICE COMMISSION

Hand-Delivered

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

RE:

Shelby Energy Cooperative, Inc.

Case No. 2018-00050

Dear Ms. Pinson:

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

Respectfully yours,

February 23, 2018

CRAWFORD & BAXTER, P.S.C.

James M. Crawford

Counsel for Shelby Energy Cooperative, Inc.

JMC/mns

Enclosure

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FEB 2 3 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

APPROVAL OF MASTER POWER PURCHASE AND

SALE AGREEMENT AND TRANSACTIONS THEREUNDER

MOTION TO INTERVENE OF

SHELBY ENERGY COOPERATIVE, INC.

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

- 1. Shelby is a not-for-profit, member-owned rural electric distribution cooperative organized under KRS Chapter 279. Shelby is incorporated in the Commonwealth of Kentucky, and attests that it is presently a Kentucky corporation in good standing.
- 2. Shelby is engaged in the business of distributing retail electric power to approximately 12,660 members located in the counties of Anderson, Shelby, Trimble, Henry, Carroll, Franklin, Jefferson, Oldham, Owen and Spencer. Shelby is one (1) of sixteen (16) ownersmembers of East Kentucky Power Cooperative, Inc. ("EKPC"). Shelby and EKPC (as well as each

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¹Shelby'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; Owen Electric Cooperative, Inc.; Salt River Electric Cooperative Corporation; and Taylor County Rural Electric Cooperative Corporation.

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

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

CRAWFORD & BAXTER, P.S.C. ATTORNEYS-AT-LAW CARROLLTON, KY

Respectfully Submitted,

James M. Crawford, Esq.

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COUNSEL FOR SHELBY ENERGY 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

Crawford & Baxter, P.S.C.

P.O. Box 353

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Attorney for Shelby Energy Cooperative, Inc.