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January 10, 2019

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PUBLIC SERVICE
COMMISSION

Via Hand Delivery

Hon. Gwen R. Pinson
Executive Director
Public Service Commission
211 Sower Blvd.
P. O. Box 615
Frankfort, KY 40601

Re: *In the Matter of: A Review of the Rate Case Procedure For Electric Distribution Cooperatives, Case No. 2018-00407*

Dear Executive Director Pinson:

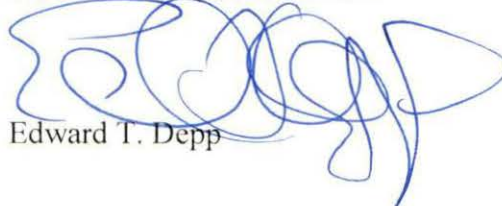
Consistent with the Commission's Order entered in the above-referenced matter on December 11, 2018, please find enclosed and accept for filing an original and ten (10) copies of Comments on behalf of Kentucky Association of Electric Cooperatives, Inc.

Please return a file-stamped copy upon filing.

Thank you, and if you have any questions with regard to this matter, please call me.

Sincerely,

DINSMORE & SHOHL LLP



Edward T. Depp

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

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JAN 10 2019

PUBLIC SERVICE
COMMISSION

In the Matter of:

A REVIEW OF THE RATE CASE)
PROCEDURE FOR ELECTRIC)
DISTRIBUTION COOPERATIVES)

CASE NO. 2018-00407

KENTUCKY ASSOCIATION OF ELECTRIC COOPERATIVES, INC.’s
COMMENTS PURSUANT TO DECEMBER 11, 2018 ORDER


Kentucky Association of Electric Cooperatives, Inc. (“Kentucky Electric Cooperatives”), by counsel and pursuant to the Commission’s December 11, 2018 order (“Order”) in the above-captioned matter, respectfully provides the following comments on the proposed pilot program for the electric distribution cooperative rate cases.

The Kentucky Electric Cooperatives appreciate the Commission’s efforts to identify an effective and efficient means for reviewing rate applications of the regulated electric distribution cooperatives. As the statewide association representing the interests of Kentucky’s electric cooperatives, we believe the proposed pilot program will prove beneficial to the multitude of diverse interests that the Commission must balance when reviewing electric distribution rate applications. This program is well-designed to accomplish that balance by focusing on the inquiries most relevant to the unique circumstances of electric distribution cooperatives, while streamlining administrative costs and resources for all involved, and still protecting the ultimate objective of fair, just, and reasonable rates. To that end, Kentucky’s electric cooperatives look forward to constructively partnering with the Commission to test and refine these procedures so that the Commission, our member-owners, and we all benefit from an efficient and focused review of distribution cooperative rate applications.

As non-profit utilities owned by our members, Kentucky's electric cooperatives work daily to provide safe, affordable, and reliable electricity to our members and communities, which represent approximately thirty-five percent (35%) of the Commonwealth's population in 117 of Kentucky's 120 counties. We believe the Commission's pilot program is well-positioned to support those objectives, all the while helping the Commission allocate its resources in the most efficient manner possible. We appreciate the cooperative spirit of this program, and we are excited to partner in this effort to enhance thoughtful review and efficient process.

This the 10th day of January, 2019.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read 'Edward T. Depp', written over a horizontal line.

Edward T. Depp
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*Counsel to Kentucky Association of
Electric Cooperatives, Inc.*

CERTIFICATE OF SERVICE

Pursuant to 807 KAR 5:001, Section 6, the undersigned certifies that a copy of this document has been deposited into the custody and care of the U.S. Mail for service upon each of the recipients listed below, on this 10th day of January, 2019.

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