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May 24, 2019

VIA HAND DELIVERY

Ms. Gwen Pinson Executive Director Kentucky Public Service Commission 211 Sower Boulevard Frankfort, KY 40601

RE: Motion to Submit, Case No. 2019-00059

Dear Ms. Pinson:

Enclosed, please find an original and ten copies of the Motion to Submit filed on behalf of East Kentucky Power Cooperative, Inc. in the above-styled matter. Please return a file-stamped copy of this filing to my office. Should you have any questions, please feel free to contact me at your convenience.

Sincerely David S. Samford

Enc.



## **COMMONWEALTH OF KENTUCKY**

MAY 2 4 2019

PUBLIC SERVICE COMMISSION

**BEFORE THE PUBLIC SERVICE COMMISSION** 

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IN THE MATTER OF:

DEMAND SIDE MANAGEMENT FILING OF EAST KENTUCKY POWER COOPERATIVE, INC.

Case No. 2019-00059

## MOTION TO SUBMIT FOR A DECISION ON THE EXISTING RECORD

Comes now East Kentucky Power Cooperative, Inc. ("EKPC"), by counsel, and moves the Kentucky Public Service Commission ("Commission") to submit the above-styled case for a decision on the merits based upon the existing record. In support of this Motion, EKPC respectfully states that the procedural deadlines from the Commission's February 27, 2019 Scheduling Order have passed. There are no intervenors in the case. Accordingly, the administrative record appears to be complete and the case may be submitted to the Commission for a final decision on the merits based upon the existing administrative record. EKPC hereby waives its right to a hearing so that a decision may be given at the Commission's earliest opportunity.

WHEREFORE, EKPC respectfully requests that the Commission take the case under submission and issue a final Order regarding same based upon the existing administrative record.

This 24<sup>th</sup> day of May, 2019.

Respectfully submitted,

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