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PUBLIC SERVICE COMMISSION

David S. Samford (859) 368-7740 david@gosssamfordlaw.com

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. 2019-00060

Dear Ms. Pinson:

Enclosed, please find an original and ten copies of the Motion to Submit filed on behalf of Big Sandy Rural Electric Cooperative, Inc., Cumberland Valley Electric, Inc., Farmers Rural Electric Cooperative Corporation, Inter-County Energy Cooperative Corporation, Licking Valley Rural Electric Cooperative Corporation, Nolin Rural Electric Cooperative Corporation, Owen Electric Cooperative, Inc., Salt River Electric Cooperative Corporation, Shelby Energy Cooperative, South Kentucky Rural Electric Cooperative Corporation, and Taylor County Rural Electric Cooperative Corporation 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

## RECEIVED

BEFORE THE PUBLIC SERVICE COMMISSION

MAY 2 4 2019

PUBLIC SERVICE COMMISSION

## IN THE MATTER OF:

DEMAND SIDE MANAGEMENT FILING OF 15 OF EAST KENTUCKY POWER COOPERATIVE, INC.'S COOPERATIVES	) )	Case No. 2019-00060
MOTION TO SUBMIT FOR A DECISION (	ON THE	EXISTING RECORD

Come now 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, Licking Valley Rural Electric Cooperative Corporation, Nolin Rural Electric Cooperative Corporation, Owen Electric Cooperative, Inc., Salt River Electric Cooperative Corporation, Shelby Energy Cooperative, South Kentucky Rural Electric Cooperative Corporation, and Taylor County Rural Electric Cooperative Corporation (collectively "Distribution Cooperatives"), by counsel, and move 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, the Distribution Cooperatives respectfully state 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.

The Distribution Cooperatives hereby waive the right to a hearing so that a decision may be given at the Commission's earliest opportunity.

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

This 24th day of May, 2019.

Respectfully submitted,

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Counsel for the Distribution Cooperatives