## **COMMONWEALTH OF KENTUCKY**

## **BEFORE THE PUBLIC SERVICE COMMISSION**

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PUBLIC SERVICE COMMISSION

In the Matter of:

THE APPLICATION OF EAST KENTUCKY POWER)COOPERATIVE, INC. FOR A CERTIFICATE OF)PUBLIC CONVENIENCE AND NECESSITY FOR)FOR THE CONSTRUCTION OF A 138 kV ELECTRIC)2005-00458TRANSMISSION LINE IN ROWAN CO, KENTUCKY)

## **MOTION FOR EXPEDITED SCHEDULE**

Comes the Applicant, East Kentucky Power Cooperative, Inc., by and through duly authorized and appointed counsel and moves the Commission to expedite the schedule in this case to the extent possible.

Since the Commission has previously established the need for this particular transmission in it's Order dated November 9, 2005 in Case No. 2005-00089, it should not be necessary for the Commission to obtain the services of a Consultant to re-examine this issue. As a result, the time that would be required for a consultant's interview, data requests on the issue of need and responses thereto should not be necessary. To the extent that this could expedite these proceedings, the Applicant requests that the Commission do so.

The Applicant would also refer the Commission to the Affidavit of Mary Jane Warner included in the Application in the present Case as Exhibit XIII, the Prepared Testimony of Darrin Adams and William Bosta, included in the Application as Exhibits XIV and XV, and the Prepared Testimony of Darrin Adams included in the Application as Exhibit XVI. The evidence contained in these Exhibits underscores the critical need to have this particular transmission line in place as soon as possible. Each day this line is not in place is another day that the Applicant's members are exposed both to the risk of cascading blackouts in this area as well as the substantial costs of re-dispatch of the Applicant's generation units.

As a result, the Applicant would respectfully request the Commission to Expedite the Schedule in these proceedings to the extent that is possible.

RESPECTFULLY SUBMITTED,

DALE W. HENLEY SHERMAN GOODPASTER III

ATTORNEYS FOR EAST KENTUCKY POWER COOPERATIVE, INC. PO BOX 707 WINCHESTER, KY 40392-0707 859-744-4812

## **CERTIFICATE OF SERVICE**

This is to certify that a true and correct copy of the foregoing was filed and that the original and 10 copies have been mailed this day to the Commission and served herein by mailing such copy thereof via U.S. Mail, first-class postage prepaid to Ms. Elizabeth O'Donnell, Executive Director, Public Service Commission, 211 Sower Boulevard, PO Box 615, Frankfort, KY 40602 this 13th day of December, 2005.

SHERMAN GOODPASTER III