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JUN 30 2010

PUBLIC SERVICE
COMMISSION

June 30, 2010

Mr. Jeff Derouen
Executive Director
Kentucky Public Service Commission
211 Sower Boulevard
Post Office Box 615
Frankfort, Kentucky 40602

RE: Case No. 2010-00238

Dear Mr. Derouen:

Please find enclosed for filing with the Commission in the above-referenced case an original and ten copies of East Kentucky Power Cooperative, Inc.'s Motion for Extension of Time to File Direct Testimony.

Please file same of record in the captioned case.

Sincerely,



Mark David Goss
Counsel for East Kentucky Power Cooperative, Inc.

Cc: All Parties of Record

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

IN THE MATTER OF:

AN INVESTIGATION OF EAST KENTUCKY)
POWER COOPERATIVE, INC.'S NEED FOR) CASE NO. 2010-00238
THE SMITH 1 GENERATING FACILITY)

**EAST KENTUCKY POWER COOPERATIVE, INC.'S
MOTION TO AMEND PROCEDURAL SCHEDULE TO
EXTEND THE TIME IN WHICH TO FILE DIRECT TESTIMONY**

Comes now, East Kentucky Power Cooperative, Inc. ("EKPC"), by and through counsel, and respectfully moves the Kentucky Public Service Commission ("Commission") to issue an Order granting EKPC through and including August 27, 2010, to file its direct testimony. In support of this motion, EKPC states as follows:

1. On June 22, 2010, the Commission issued an Order initiating the investigation of EKPC's need for and the availability of viable alternatives to Smith Unit 1 CFB, a 278 MW electric generating unit previously authorized to be constructed by Order of the Commission dated August 29, 2006 in Case No. 2005-00053. The Commission's June 22, 2010 Order clearly sets forth its intention to "conduct a rigorous and comprehensive investigation of the need for and financial implications of Smith 1" (Order, page 8). In furtherance of this "rigorous and comprehensive investigation", the Commission wishes to re-review: (a) EKPC's current projected need for additional baseload generating capacity; (b) whether Smith 1 remains the least costly option available to meet EKPC's need for additional baseload capacity; and, (c) the impact to EKPC's financial integrity from either constructing Smith 1 or pursuing other options. Considering the extent of this investigation the Appendix to the above-referenced Order provides

for a fairly compressed procedural schedule, and includes the request for EKPC to file direct testimony on many complex issues, in verified prepared form, no later than July 23, 2010.

2. For example, one of the items requested to be included in EKPC's direct testimony is "a discussion of its most recent long-term load forecast and its existing generating capacity" (Order, Page 8). EKPC's most recent, completed long-term load forecast is its 2008 load forecast. In Case No. 2010-00167, EKPC provided its 2010 load forecast milestones in the Direct Testimony of John R. Twitchell (Volume 2, Exhibit JRT-1, Page 7 of 35). In order to fully respond to the Commission's investigation in this matter using the most recent data available, EKPC is expediting the completion of its 2010 long-term load forecast. This 2010 forecast is scheduled to be approved by the EKPC Board of Directors at its August 10, 2010 meeting.

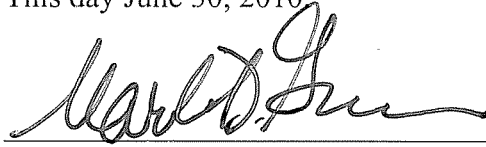
3. The investigation which the Commission has opened in this case essentially amounts to a de novo Certificate of Public Convenience and Necessity ("CPCN") case under KRS 278.020. EKPC wishes to provide the best and most comprehensive testimony that it can in observance of the Commission's Order. However, this cannot be accomplished under the timeframe set forth in the current procedural schedule. EKPC requests that the Commission afford it an additional 35 days, or to August 27, 2010, within which to provide the requested direct testimony. In addition, EKPC requests that the Commission extend all subsequent deadlines accordingly.

4. This request is not made for purposes of hindrance or delay, but merely to allow EKPC adequate time to provide meaningful and comprehensive testimony in a matter which is of vital importance to EKPC, its Member System owners, and their retail ratepayers. A 35 day

delay will not unfairly prejudice any of the Intervenors nor complicate this investigation since there is no statutory deadline under which the Commission must issue its decision.

WHEREFORE, EKPC respectfully requests that the Commission issue an Order amending the current procedural schedule and granting EKPC through and including August 27, 2010, to file its direct testimony; and, that all subsequent deadlines in the procedural schedule be extended accordingly.

This day June 30, 2010.

A handwritten signature in black ink, appearing to read "Mark D. Goss", written over a horizontal line.

Mark David Goss
Counsel for East Kentucky Power Cooperative, Inc.
Frost Brown Todd, LLC
250 W. Main Street, Suite 2800
Lexington, KY 40507-1749

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Motion to Amend Procedural Schedule to Extend the Time in Which to File Direct Testimony was sent to the following parties of record by U.S. Mail, postage prepaid, on this 30th day of June 2010.

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A handwritten signature in black ink, appearing to read "Robert Ukeiley", written in a cursive style.

Counsel for East Kentucky Power Cooperative, Inc.