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May 15, 2012

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PUBLIC SERVICE
COMMISSION

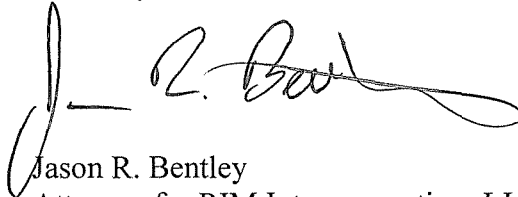
Mr. Jeff Derouen
Executive Director
Kentucky Public Service Commission
211 Sower Boulevard
P.O. Box 615
Frankfort, KY 40601

RE: Application of East Kentucky Power Cooperative, Inc. To Transfer Functional Control of Certain Transmission Facilities to PJM Interconnection, L.L.C. Case No. 2012-00169

Pursuant to 807 KAR 5:001 Section 3(7) and (8), please find enclosed an original and 10 copies of the Motion for Full Intervention by PJM Interconnection, LLC, filed on May 15, 2012, at the Kentucky Public Service Commission in Case No. 2012-00169.

Should you have any questions or concerns, please feel free to contact me at the number below.

Sincerely,



Jason R. Bentley
Attorney for PJM Interconnection, LLC
McBrayer, McGinnis, Leslie & Kirkland, PLLC
305 Ann Street, Suite 308
Frankfort, KY 40601
(502) 875-1176

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF EAST KENTUCKY POWER)
COOPERATIVE, INC.TO TRANSFER)
FUNCTIONAL CONTROL OF CERTAIN) Case No. 2012-00169
TRANSMISSION FACILITIES TO PJM)
INTERCONNECTION, LLC)

**MOTION FOR FULL INTERVENTION BY
PJM INTERCONNECTION, L.L.C.**

Pursuant to KRS 278.310 and 807 KAR 5:001 Section 3(8), PJM Interconnection L.L.C. (hereinafter “PJM”) requests that it be granted full intervenor status in the above-captioned Application and states in support thereof as follows:

1. The Petitioner, PJM, has its offices located at 955 Jefferson Avenue, Valley Forge Corporate Center, Norristown, Pennsylvania 19403-2497. The Petitioner’s attorney for the purposes of receiving service of all documents in this proceeding is Jason Bentley, Esq., McBrayer, McGinnis, Leslie & Kirkland, PLLC, 305 Ann Street, Suite 308, Frankfort, Kentucky 40601.

2. PJM is the Independent System Operator (“ISO”) and Regional Transmission Organization (“RTO”) for all or part of Delaware, Illinois, Indiana, Kentucky, Maryland, Michigan, New Jersey, North Carolina, Ohio, Pennsylvania, Tennessee, Virginia, West Virginia and the District of Columbia.¹ PJM is the transmission provider under, and the administrator of,

¹ *Pennsylvania-New Jersey-Maryland Interconnection*, 81 FERC ¶ 61,252 (1997), *reh’g denied*, 92 FERC ¶ 61,282 (2000); *PJM Interconnection, L.L.C.*, 101 FERC ¶ 61,345 (2002). As an ISO and RTO, PJM’s organization and

the PJM Open Access Transmission Tariff.² PJM also operates the energy, capacity and ancillary service markets and conducts the day-to-day operations of the bulk power system in the PJM region.

3. PJM's primary responsibilities are to ensure the safe and reliable operation of the transmission system and to facilitate the reliable supply of energy from generating resources to wholesale customers in the PJM region. Pursuant to Section 7.7(i) of the PJM Operating Agreement, PJM is obligated to ensure the safe and reliable operation of the transmission grid and to create and operate a robust, competitive, and non-discriminatory electric power market.

4. PJM has an interest in this Application that is not adequately represented by other parties to this proceeding. East Kentucky Power Cooperative, Inc.'s (hereinafter EKPC) application was filed to allow it to transfer functional control of its transmission facilities to PJM effective June 1, 2013.

5. Through its participation in this proceeding, PJM seeks to be a resource to the Public Service Commission to develop facts as may be necessary to assist the Commission in fully considering EKPC's Application. PJM's participation will assist the Commission by providing technical expertise on PJM markets, transmission expansion planning, and operations, and will allow the Commission to draw upon PJM's experience with current RTO operations in Kentucky and regionally on behalf of PJM members.

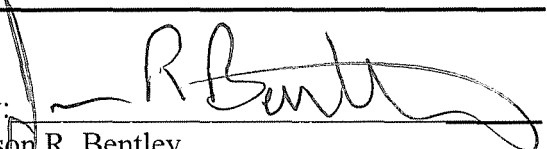
6. PJM states that its participation in this case will assist the Commission in reaching its decision and would not unduly interrupt the proceedings.

operations are wholly governed by the Federal Energy Regulatory Commission ("FERC") pursuant to Orders 888, 889, and 2000, promulgated pursuant to the Federal Power Act and subsequent amendments (16 U.S.C. 791a et. seq.).

² See *PJM Interconnection, L.L.C., Open Access Transmission Tariff*.

WHEREFORE, PJM respectfully requests the Commission to grant its Petition To Intervene and to allow it to participate with full intervenor status in this proceeding.

Dated this 15th day of May, 2012.

By: 

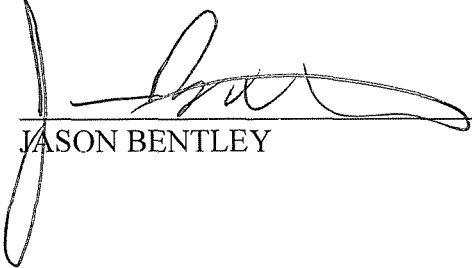
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CERTIFICATE OF SERVICE

15th It is hereby certified that a copy of the foregoing was served by hand delivery this May, 2012, upon the following:

Kentucky Public Service Commission
211 Sower Boulevard
Frankfort, KY 40601

It is hereby certified that a copy of the foregoing was served via U.S. Mail, postage prepaid, this 15th day of May, 2010, upon the following service list:



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