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December 10, 2012

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PUBLIC SERVICE COMMISSION

Mr. Jeffrey Derouen
Executive Director
Kentucky Public Service Commission
P.O. Box 615
211 Sower Boulevard
Frankfort, KY 40602

Re:

PSC Case No. 2012-00149, In the Matter of: 2012 Integrated Resource

Plan of East Kentucky Power Cooperative, Inc.

Dear Mr. Derouen:

Enclosed please find for filing with the Commission in the above-referenced case an original and ten (10) copies of East Kentucky Power Cooperative, Inc.'s Motion for Enlargement of Time. Please return a file-stamped copy to me.

Do not hesitate to contact me if you have any questions.

Mark David Yoss by apr

Very truly yours,

Mark David Goss

**Enclosures** 

## COMMONWEALTH OF KENTUCKY

RECEIVED

BEFORE THE PUBLIC SERVICE COMMISSION

DEC 1 0 2012 PUBLIC SERVICE

COMMISSION

IN THE MATTER OF:

2012 INTEGRATED RESOURCE PLAN OF	)	
EAST KENTUCKY POWER COOPERATIVE, INC.	)	Case No. 2012-00149
	)	

## EAST KENTUCKY POWER COOPERATIVE, INC.'S MOTION FOR ENLARGEMENT OF TIME

Comes now East Kentucky Power Cooperative, Inc. ("EKPC"), by and through counsel, and moves the Kentucky Public Service Commission ("Commission") for an Order enlarging the time by which EKPC must comply with the Commission's December 4, 2012 Order, for a period of ten (10) additional days, or to December 20, 2012.

In support of this Motion, EKPC states that the Commission entered its Order on December 4, 2012 directing that EKPC respond to requests which sought information concerning emission testing that EKPC has conducted, or intends to conduct, to determine the best way to achieve compliance with the Mercury and Air Toxic Standards, as well as emission rate and annual emissions from EKPC's coal fired generating units; and, annual environmental capital expenditures for each year from 2012 – 2016 for each of EKPC's coal units.

The Commission's Order directed that these items be produced by EKPC only six days later. Considering the extra days which it took for EKPC to actually receive and be provided notice of the Commission's Order, it is unduly burdensome for EKPC to be required to respond to all of these items in such a short period.

In addition, the Commission's Order requires EKPC to provide certain information which EKPC has previously claimed are subject to the attorney-client privilege or the attorney work product rule. EKPC needs additional time to evaluate this portion of the Order and the information which the Order requires be produced.

WHEREFORE, EKPC respectfully requests that the Commission sustain EKPC's Motion for Enlargement of Time to provide that EKPC will not be required to comply with the December 4, 2012 Order until December 20, 2012.

Dated this 10<sup>th</sup> day of December 2012.

Respectfully submitted,

Mark David Goss by april

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Counsel for East Kentucky Power Cooperative, Inc.

## **CERTIFICATE OF SERVICE**

This will certify that a true and correct copy of the foregoing was served, by depositing same in the custody and care of the U.S. Mail, postage pre-paid, on this 10th day of December, 2012, addressed to the following:

Joe Childers
Joe F. Childers & Associates
300 Lexington Building
201 West Short Street
Lexington, KY 40507

Kristin Henry Staff Attorney Sierra Club 85 Second Street San Francisco, CA 94105

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Cooperative, Inc.