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April 3, 2017

VIA HAND DELIVERY

Ms. Talina Mathews, Ph.D.
Executive Director
Kentucky Public Service Commission
P.O. Box 615
211 Sower Boulevard
Frankfort, KY 40602

Re: PSC Case No. 2017-00129

Dear Dr. Mathews:

Please find enclosed for filing with the Commission in the above-referenced matter an original and ten copies of a Comment on Filing Made by PJM Interconnection, LLC and Motion to Withdraw Issues from East Kentucky Power Cooperative, Inc. ("EKPC"). Please return file-stamped copies of this filing to my office.

Very truly yours,

A handwritten signature in blue ink, appearing to read "D. S. Samford", written over a horizontal line.

David S. Samford

Enclosures

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PUBLIC SERVICE
COMMISSION

COMMONWEALTH OF KENTUCKY

BEFORE THE KENTUCKY PUBLIC SERVICE COMMISSION

IN THE MATTER OF:

THE APPLICATION OF EAST KENTUCKY)	
POWER COOPERATIVE, INC. FOR A)	
DECLARATORY ORDER CONFIRMING THE)	
EFFECT OF KENTUCKY LAW AND)	Case No. 2017-00129
COMMISSION PRECEDENT ON RETAIL)	
ELECTRIC CUSTOMERS' PARTICIPATION IN)	
WHOLESALE ELECTRIC MARKETS)	

**COMMENT ON FILING MADE BY PJM INTERCONNECTION, LLC
AND MOTION TO WITHDRAW ISSUE**

Comes now East Kentucky Power Cooperative, Inc. ("EKPC"), by counsel, and respectfully states as follows:

EKPC filed its Verified Application seeking a Declaratory Order from the Commission on March 10, 2017. Since then, EKPC and PJM Interconnection, LLC ("PJM") have discussed a possible resolution of the issues raised in the Verified Application, which was shared with Commission Staff at the informal conference held on Wednesday, March 29, 2017 at the Commission's offices. The proposal has been further described in a March 31, 2017 letter from PJM's Denise Foster to the Commission's Executive Director. EKPC believes that the commitment made by PJM to actively engage its stakeholder process in a tariff amendment that explicitly provides for an "op-in/opt-out" approach to energy efficiency in PJM's capacity market is appropriate and consistent with the Integration Orders entered by the Commission as referenced in the Verified Application, particularly in light of PJM's further assurances that: 1) its processes will change to provide transparency as to whether any energy efficiency is bid into the capacity

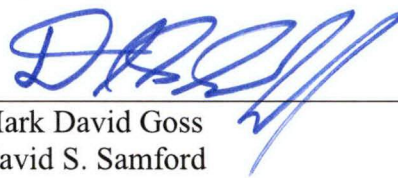
market from within the service territories of EKPC or other PJM-utilities operating in Kentucky; and 2) any energy efficiency resources that have already cleared the capacity market will be able to withdraw such resources in the applicable delivery years without consequence.

EKPC also agrees with PJM that it is still necessary for the Commission to enter a Declaratory Order in this proceeding that addresses the issues relating to Kentucky law and EKPC's Owner-Member tariffs. However, EKPC now believes that PJM's actions will render the question of whether PJM is subject to the Commission's jurisdiction for the purposes set forth in EKPC's Verified Application moot. Accordingly, EKPC moves to withdraw that issue without prejudice. EKPC expresses no opinion with regard to the remainder of PJM's comments.

WHEREFORE, on the basis of the foregoing, EKPC respectfully requests the Commission to permit EKPC to withdraw the issue as to the Commission's jurisdiction over PJM that is contained in the Verified Application as part of any Declaratory Order granting the relief requested by EKPC and now agreed to by PJM.

Done this 3rd day of April, 2017.

Respectfully submitted,



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