

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

THE APPLICATION OF SOUTH KENTUCKY RURAL)
ELECTRIC COOPERATIVE CORPORATION FOR) Case No. 2018-00050
APPROVAL OF MASTER POWER PURCHASE AND)
SALE AGREEMENT AND TRANSACTIONS THEREUNDER)

MOTION TO INTERVENE OF
SALT RIVER ELECTRIC COOPERATIVE CORPORATION

Pursuant to K.R.S. subsection 278.310 and 807 KAR 5:001, Section 4(11), Salt River Electric Cooperative Corporation (“SRECC”), requests that it be granted full intervenor status in the above-captioned proceeding and states in support thereof as follows:

1. SRECC is a not-for-profit, member-owned rural electric distribution cooperative organized under KRS Chapter 279. SRECC is incorporated in the Commonwealth of Kentucky, and attests that it is presently a Kentucky corporation in good standing.

2. SRECC is engaged in the business of distributing retail electric power to approximately 51,000 members located in the counties of Anderson, Bullitt, Jefferson, LaRue, Marion, Mercer, Nelson, Shelby, Spencer and Washington. SRECC is one (1) of sixteen (16) owners-members of East Kentucky Power Cooperative, Inc. (“EKPC”).¹ SR and EKPC (as well as each other Owner-Member distribution cooperative and EKPC, respectively) have entered into

¹ SRECC’s sister cooperatives are: South Kentucky Rural Electric Cooperative Corporation; Big Sandy Rural Electric Cooperative Corporation; Blue Grass Energy Cooperative Corporation; Clark Energy Cooperative, Inc.; Cumberland Valley Electric, Inc.; Farmers Rural Electric Cooperative Corporation; Fleming-Mason Energy Cooperative, Inc.; Grayson Rural Electric Cooperative Corporation; Inter-County Energy Cooperative Corporation; Jackson Energy Cooperative Corporation; Licking Valley Rural Electric Cooperative Corporation; Nolin Rural Electric Cooperative Corporation; Owen Electric Cooperative, Inc.; Shelby Energy Cooperative, Inc.; and Taylor County Rural Electric Cooperative Corporation.

the Wholesale Power Contract dated October 1, 1964, Amendment No. 3 and the Memorandum of Understanding and Agreement regarding Alternate Power Sources all as referenced in South Kentucky Rural Electric Cooperative Corporation's Application in the above captioned proceeding.

3. The matters being decided by the Commission in this case will have a significant impact on the rates paid by SRECC and its members for electricity. The attorneys for SRECC authorized to represent it in this proceeding and to take service of all documents are:

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4. The position of SRECC and its members cannot be adequately represented by any existing party. SRECC intends to play a constructive role in the Commission's decision-making process herein and SRECC's participation will not unduly prejudice any party.

WHEREFORE, SRECC requests that it be granted full intervenor status in the above captioned proceedings.

Respectfully submitted,



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COUNSEL FOR SALT RIVER ELECTRIC
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FEBRUARY 23, 2018

This is to certify that the foregoing was served on the following, this 23 day of February, 2018:

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