



ATTORNEYS AT LAW | PLLC

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JUN 25 2018

PUBLIC SERVICE
COMMISSION

L. Allyson Honaker

(859) 368-7740

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June 25, 2018

VIA HAND DELIVERY

Ms. Gwen R. Pinson
Executive Director
Kentucky Public Service Commission
P.O. Box 615
211 Sower Boulevard
Frankfort, KY 40601

Re: In the Matter of an Examination by the Public Service Commission of the Environmental Surcharge Mechanism of East Kentucky Power Cooperative, Inc., for the Six-Month Billing Periods Ending December 31, 2017, and the Pass Through Mechanism for its Sixteen Member Distribution Cooperatives - Case No. 2018-00075

Dear Ms. Pinson:

Enclosed, please find for filing with the Commission in the above-referenced case an original and ten copies of a Motion to Submit Case for Adjudication on the Administrative Record.

Please return a file-stamped copy of this filing to my office.

Very truly yours,

A handwritten signature in blue ink that reads "L. Allyson Honaker".

L. Allyson Honaker

Enclosures

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COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

PUBLIC SERVICE COMMISSION

In the Matter of:

AN EXAMINATION BY THE PUBLIC SERVICE)
 COMMISSION OF THE ENVIRONMENTAL)
 SURCHARGE MECHANISM OF EAST KENTUCKY)
 POWER COOPERATIVE, INC. FOR THE SIX-)
 MONTH BILLING PERIOD ENDING DECEMBER)
 31, 2017 AND THE PASS THROUGH MECHANISM)
 FOR ITS SIXTEEN MEMBER DISTRIBUTION)
 COOPERATIVES)

CASE NO. 2018-00075

MOTION TO SUBMIT CASE FOR ADJUDICATION
ON THE ADMINISTRATIVE RECORD

Comes now East Kentucky Power Cooperative, Inc. (“EKPC”), by counsel, and, for itself and on behalf of its sixteen Members, hereby moves the Kentucky Public Service Commission (“Commission”) to submit the case for a decision based upon the existing record and without the need for a hearing, respectfully stating as follows:

On April 6, 2018, the Commission issued an Order opening an investigation for the six-month review of EKPC’s environmental surcharge and pass-through mechanisms. The April 6, 2018 Order contained a procedural schedule which allowed for the filing of direct testimony, data requests and a deadline for motions to intervene in the case. EKPC and its Members have provided all of the requested information and there have been no motions for intervention filed in this case. EKPC and its Members have until August 3, 2018, to request a hearing or submit the case for a decision on the existing record.

Since the remainder of the procedural schedule only applies to intervenors, and there are no intervenors in this case, EKPC and its Members believe the administrative record is complete and it would be appropriate for the Commission to make a ruling based upon the record. EKPC and its Members respectfully request a decision from the Commission based upon the existing record.

WHEREFORE, EKPC and its Members move the Commission to submit the case on the existing administrative record.

This 25th day of June, 2018.

Respectfully submitted,



David S. Samford

L. Allyson Honaker

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Counsel for East Kentucky Power Cooperative, Inc.

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the foregoing was served by depositing same in the custody and care of the U.S. Mails, postage pre-paid, on this 25th day of June, 2018 addressed to the following:

Bobby Sexton
President & General Manager
Big Sandy R.E.C.C.
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Paintsville, KY 41240-1422

Chris Brewer
President & CEO
Clark Energy Cooperative, Inc.
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Winchester, KY 40392-0748

Bill T. Prather
President & CEO
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Glasgow, KY 42141-1298

Carol Ann Fraley
President & CEO
Grayson R.E.C.C.
109 Bagby Park
Grayson, KY 41143

Carol Wright
President & CEO
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Counsel for East Kentucky Power Cooperative, Inc.