

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

IN THE MATTER OF:

| | | |
|--|---|------------|
| APPLICATION OF CITIPOWER, LLC FOR (1) AN |) | |
| ADJUSTMENT OF RATES PURSUANT TO 807 KAR 5:076; |) | |
| (2) APPROVAL FOR A CERTIFICATE OF PUBLIC |) | CASE NO. |
| CONVENIENCE AND NECESSITY TO PURCHASE |) | 2019-00109 |
| PIPELINE AND OTHER RELATED ASSETS; AND |) | |
| APPROVAL OF FINANCING |) | |

**MOTION TO SUBMIT CASE FOR ADJUDICATION
ON THE ADMINISTRATIVE RECORD AND
WAIVER OF RIGHT TO HEARING**

Comes now Citipower, LLC (“Citipower”), by counsel, and 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:

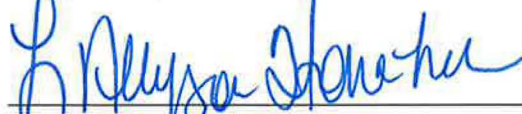
On July 1, 2019, the Commission issued an Order establishing the procedural schedule in this proceeding. The procedural schedule which allowed for two rounds of data requests and a deadline for motions to intervene in the case. Citipower has provided all of the requested information and there have been no motions for intervention filed in this case. Citipower has until August 26, 2019, to request a hearing or submit the case for a decision on the existing record.

Since there are no intervenors in this case and since the only remaining item on the procedural schedule is to request a hearing or submit for a decision on the existing record, Citipower believes the administrative record is complete and it would be appropriate for the Commission to make a ruling based upon the record. Citipower respectfully waives the right to a hearing and requests a decision from the Commission based upon the existing record.

WHEREFORE, Citipower moves the Commission to submit the case on the existing administrative record.

This 23rd day of August, 2019.

Respectfully submitted,



David S. Samford

L. Allyson Honaker

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Counsel for Citipower, LLC.

CERTIFICATE OF SERVICE

In accordance with 807 KAR 5:001, Section 8, this is to certify that the electronically filed documents are true and accurate copies of the same documents being filed in paper medium; that the electronic filing has been transmitted to the Commission on August 23, 2019; that there are currently no parties in this proceeding that the Commission has excused from participation by electronic means; and that the original versions of the documents transmitted electronically will be filed with the Commission in paper medium within two business days from the date of the electronic filing.

A handwritten signature in blue ink, reading "L. Allyson Honcher". The signature is written in a cursive style with a large initial "L".

Counsel for Citipower, LLC.