

**COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION**

IN THE MATTER OF:

APPLICATION OF BIG RIVERS)	
ELECTRIC CORPORATION FOR)	CASE NO. 2019-00269
ENFORCEMENT OF RATE AND)	
SERVICE STANDARDS)	

**MOTION FOR EVIDENTIARY HEARING
OF BIG RIVERS ELECTRIC CORPORATION**

Big Rivers Electric Corporation (“Big Rivers”) hereby moves the Kentucky Public Service Commission (“Commission”) for an Order scheduling an evidentiary hearing in this matter as soon as reasonably possible. This case has been pending since July 31, 2019. It is important that these matters be timely resolved so that public health and safety hazards (particularly asbestos abatement) associated with Station Two may be addressed. Additionally, Station Two ash pond closure is required to be completed by April 2024 pursuant to the Coal Combustion Residual Rule, and that deadline is approaching. Consequently, Big Rivers respectfully requests a hearing at the Commission’s earliest convenience.

Respectfully submitted,

/s/ Michael L. Kurtz

Michael L. Kurtz, Esq.
Kurt J. Boehm, Esq.
Jody Kyler Cohn, Esq.
BOEHM, KURTZ & LOWRY
36 East Seventh Street, Suite 1510
Cincinnati, Ohio 45202

Ph: 513.421.2255 fax: 513.421.2764
mkurtz@BKLLawfirm.com
kboehm@BKLLawfirm.com
jkylercohn@BKLLawfirm.com

Tyson Kamuf, Esq.
BIG RIVERS ELECTRIC
CORPORATION
201 Third Street, P.O. Box 727
Henderson, Kentucky 42419-0024
Ph: (270) 827-2561 Fax: (270) 844-6417
tyson.kamuf@bigrivers.com

**COUNSEL FOR BIG RIVERS
ELECTRIC CORPORATION**

August 28, 2020