

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

**IN THE MATTER OF:**

<b>AN ELECTRONIC APPLICATION OF JACKSON</b>	)	
<b>PURCHASE ENERGY CORPORATION FOR A</b>	)	
<b>CERTIFICATE OF PUBLIC CONVENIENCE AND</b>	)	<b>CASE NO.</b>
<b>NECESSITY TO CONSTRUCT A NEW</b>	)	<b>2019-00326</b>
<b>HEADQUARTERS FACILITY</b>	)	

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

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Comes now Jackson Purchase Energy Corporation (“Jackson Purchase”), by counsel, and hereby moves the Kentucky Public Service Commission (“Commission”) to submit the above-styled case for a decision based upon the existing record and without the need for a hearing, respectfully stating as follows:

On October 24, 2019, the Commission issued an Order establishing the procedural schedule in this proceeding. The procedural schedule allowed for two rounds of data requests and a deadline for motions to intervene in the case. Jackson Purchase has provided all of the requested information and there have been no motions for intervention filed in this case. Jackson Purchase has until December 20, 2019, to request a hearing or submit the case for a decision on the existing record.

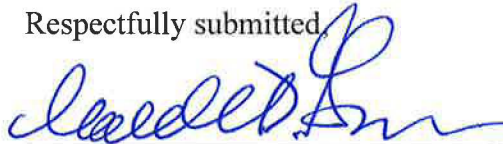
Since there are no intervenors in this case and since the only remaining item on the procedural schedule is to request a hearing or submit for a decision on the existing record, Jackson Purchase believes the administrative record is complete and it would be appropriate for the

Commission to make a ruling based upon the record. Jackson Purchase respectfully waives the right to a hearing and requests a decision from the Commission based upon the existing record within the timeframe requested in the Application. Jackson Purchase is willing to respond to any additional questions the Commission may have, or to participate in an informal conference if one is deemed necessary.

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

This 13<sup>th</sup> day of December, 2019.

Respectfully submitted,



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*Counsel for Jackson Purchase Energy Corporation*

## 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 December 13, 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.

  
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*Counsel for Jackson Purchase Energy Corporation*