

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

**IN THE MATTER OF:**

<b>AN ELECTRONIC TARIFF FILING</b>	)	
<b>OF EAST KENTUCKY POWER</b>	)	
<b>COOPERATIVE, INC. TO IMPLEMENT</b>	)	<b>CASE NO.</b>
<b>A NEW GREEN ENERGY OPTION FOR</b>	)	<b>2019-00378</b>
<b>NON-RESIDENTIAL RETAIL CUSTOMERS</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 East Kentucky Power Cooperative, Inc. (“EKPC”), 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 September 20, 2019, EKPC filed proposed tariff sheets modifying Rate H, Wholesale Renewable Energy Program in order to include a new Green Energy option for non-residential customers. The Commission issued an Order on October 29, 2019 that opened an investigation as to the reasonableness of the proposed tariff revisions. EKPC has now responded to two rounds of requests for information and no further procedural discovery is contemplated in the Commission’s October 29<sup>th</sup> Order. EKPC has been given until January 15, 2020 to request a hearing or submit the case for a decision on the existing record.

EKPC believes the administrative record is complete and that it would be appropriate for the Commission to make a ruling based upon the record. EKPC therefore respectfully waives the right to a hearing and requests a decision from the Commission based upon the existing record.

Should the Commission believe that a hearing would be helpful in further clarifying any issues, however, EKPC will eagerly participate to assist the Commission.

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

This 13<sup>th</sup> day of January, 2020.

Respectfully submitted,



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*Counsel for East Kentucky Power Cooperative, Inc.*

## CERTIFICATE OF SERVICE

In accordance with 807 KAR 5:001, Section 8, this is to certify that the motion filed herewith is a true and accurate copy of the same documents being filed in paper medium; that the electronic filing has been transmitted to the Commission on January 13, 2020; that there are currently no parties in this proceeding that the Commission has excused from participation by electronic means; and that the original in paper medium of this filing will be filed by hand-delivery with the Commission within two business days.

A handwritten signature in black ink, appearing to be 'D. B. J.', is written over a horizontal line.

*Counsel for East Kentucky Power Cooperative, Inc.*