

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC INVESTIGATION INTO ALLEGED	)	
VIOLATIONS OF KRS 278.160, 807 KAR 5:006,	)	
AND COMMISSION ORDERS BY SALT RIVER	)	
ELECTRIC COOPERATIVE CORP., SALT RIVER	)	Case No.
ELECTRIC COOPERATIVE CORP.'S BOARD OF	)	2020-00347
DIRECTORS: JIMMY LONGMIRE, CHAIRMAN;	)	
A.C. "HAPPY" CAHOE, VICE CHAIRMAN; LINDA	)	
WEST, SECRETARY; GAYLE TROUTMAN,	)	
TREASURER; DARRELL TINGLE, DIRECTOR;	)	
AND GARRY MANN, AND SALT RIVER ELECTRIC	)	
COOPERATIVE CORP.'S PRESIDENT AND	)	
CHIEF EXECUTIVE OFFICER, TIM SHARP	)	

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**RESPONSE TO ORDER**

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Comes now Salt River Electric Cooperative Corporation ("Salt River Electric"), by counsel, and in response to Ordering Paragraph 4 of the Order entered by the Commission initiating the above-styled matter on October 22, 2020 (the "Order"), respectfully states as follows.

Salt River Electric is a non-profit, member-owned rural electric cooperative organized under KRS Chapter 279 and subject to the jurisdiction of the Commission. Its primary purpose is the safe, reliable distribution of affordable electricity to its members' homes and business on terms that are fair, just and reasonable. In providing service, Salt River Electric strives to ensure full compliance with applicable authorities.

The Commission has initiated this proceeding to investigate whether Salt River Electric may have violated its tariff, relevant statute, and/or the regulations and Orders of the Commission when it acted to disconnect certain accounts for nonpayment on October 21-22, 2020. The

Commission entered its Order yesterday, October 22, and directed Salt River Electric to file responses to the Order's allegations no later than today, October 23. Also pursuant to the Order, an in-person hearing is presently scheduled before the Commission on Monday, October 26.

Salt River Electric engaged the undersigned counsel today, who has since filed an Entry of Appearance and moved for an extension of the timeline for this matter set forth in the Order. The brief additional time requested is necessary to provide an appropriate opportunity for counsel to investigate the pertinent facts and law. All parties are working diligently to ensure the Commission's allegations are appropriately examined, that all inquiries are fully and adequately answered, and all directives are properly and swiftly addressed.

At this time, Salt River Electric has reconnected all accounts it disconnected for nonpayment in recent days; it has also acknowledged its commitment to the indefinite suspension of disconnections for nonpayment pending further Order of the Commission. Meanwhile, Salt River Electric and counsel are working diligently to compile complete and appropriate responses as directed by the Commission in Ordering Paragraph 4 of the Order. Salt River Electric anticipates that it will be able to do so in supplement to this filing no later than October 30, which is one week from the date of this filing.<sup>1</sup>

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<sup>1</sup> Salt River Electric filed a motion seeking such relief earlier today. *See* Motion for Extension of Time, to Reschedule Hearing, and for Other Relief (Oct. 23, 2020).

This 23<sup>rd</sup> day of October, 2020.

Respectfully submitted,

**DINSMORE & SHOHL LLP**

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*Counsel to Salt River Electric*

**CERTIFICATION**

I hereby certify that the electronic version of this filing made with the Commission on October 23, 2020, is a true and accurate copy of the paper document that will be submitted to the Commission within 30 days of the Governor lifting the state of the emergency pursuant to the Commission's Orders in Case No. 2020-00085, and the electronic version of the filing has been transmitted to the Commission. A copy of this filing has been served electronically on all parties of record for whom an email address is given in the online Service List for this proceeding, and there are currently no parties that the Commission has excused from participation by electronic means.

/s/ Edward T. Depp  
*Counsel to Salt River Electric*