

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

IN THE MATTER OF:

**ELECTRONIC APPLICATION OF INTER-COUNTY)
ENERGY COOPERATIVE CORPORATION FOR A)
CERTIFICATE OF PUBLIC CONVENIENCE AND)
NECESSITY AUTHORIZING THE INSTALLATION)
OF A NEW ADVANCED METERING)
INFRASTRUCTURE (AMI) SYSTEM)**

**CASE NO.
2022-00350**

MOTION TO SUBMIT

Comes now Inter-County Energy Cooperative Corporation (“Inter-County”) by and through counsel, pursuant to the November 14, 2022 Order (“November 14th Order”) of the Kentucky Public Service Commission (“Commission”) other applicable law, and for its Motion to Submit this case for an adjudication based upon the existing administrative record and without a formal evidentiary hearing, respectfully states as follows:

The Commission’s November 14th Order established a procedural schedule to be followed in this proceeding. The Commission issued its First Request for Information on November 17, 2022 which were answered by Inter-County on December 9, 2022. The Commission issued supplemental requests for information on December 22, 2022 and Inter-County provided responses to the supplemental requests on January 6, 2023. There are no intervenors in this proceeding. The November 14th Order provided a deadline of January 20, 2023 for Inter-County to request a hearing or to submit the case for a decision on the existing record. Inter-County believes that the issues presented in this case are straightforward and have been adequately addressed through the written discovery. Moreover, Inter-County is unaware of any contested issues for which clarification

might be necessary or advisable. Accordingly, Inter-County does not believe that a formal evidentiary hearing is necessary in this case and moves to submit the case for an adjudication based upon the existing administrative record without a formal evidentiary hearing.

WHEREFORE, on the basis of the foregoing, Inter-County respectfully moves to submit this case for an adjudication based upon the existing administrative record and without a formal evidentiary hearing.

This 17th day of January 2023.

Respectfully submitted,



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CERTIFICATE OF SERVICE

This is to certify that the foregoing electronic filing was transmitted to the Commission on January 17, 2023 and that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding. Pursuant to the Commission's July 22, 2021 Order in Case No. 2020-00085 no paper copies of this filing will be filed.



Counsel for Inter-County Energy Cooperative Corporation