

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

In the Matter of:

Electronic Application of Jackson Purchase )	
Energy Corporation for a Certificate of )	
Public Convenience and Necessity )	Case No. 2024-00013
Authorizing the Installation of a New )	
Advanced Metering Infrastructure (AMI) )	
System )	

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JACKSON PURCHASE ENERGY CORPORATION’S MOTION TO SUBMIT

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Comes now Jackson Purchase Energy Corporation (“Jackson Purchase”), by counsel, pursuant to the February 2, 2024 Order of the Kentucky Public Service Commission (“Commission”) and other applicable law, and requests to submit this matter for a decision based upon the existing administrative record without a formal evidentiary hearing and requests a decision on the matter by **May 28, 2024**. Jackson Purchase respectfully states as follows:

The Commission’s February 2, 2024 Order set forth the procedural schedule for the proceedings. There are no intervenors in this proceeding. Commission Staff issued requests for information on March 11, 2024. Jackson Purchase provided responses to the requests for information on March 25, 2024. Commission Staff issued supplemental requests for information on April 4, 2024. Jackson Purchase is providing its supplemental responses contemporaneously with this motion. The February 2, 2024 Order allows Jackson Purchase to request or waive a hearing on or before April 29, 2024. Jackson Purchase believes a robust and complete record has been developed through the Application, testimony contained in the Application, and responses to requests for information. The interests of administrative economy favor avoiding a formal hearing

when it would be unlikely to result in the development of any additional facts and Jackson Purchase is unaware of any contested issues or additional facts that would be developed at a formal hearing.

WEREFORE, on the basis of the foregoing, Jackson Purchase respectfully moves to submit this proceeding based upon the existing administrative record. Jackson Purchase respectfully request a decision on this matter on or before **May 28, 2024**.

This the 18<sup>th</sup> day of April, 2024.

Respectfully submitted,

*Heather S. Temple*

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## **CERTIFICATE OF SERVICE**

This is to certify that foregoing electronic filing was transmitted to the Commission on April 18, 2024; that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding; and that pursuant to the Commission's July 22, 2021 Order in Case No. 2020-00085, no paper copies of the filing will be made.

*Heather S. Temple*

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*Counsel for East Kentucky Power Cooperative, Inc.*