

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

In the matter of:	:	
ELECTRONIC APPLICATION OF EAST	:	CASE NO.
KENTUCKY POWER COOPERATIVE, INC.	:	2024-00129
FOR A CERTIFICATES OF PUBLIC CONVENIENCE	:	
AND NECESSITY AND SITE COMPATIBILITY	:	
CERTIFICATES FOR THE CONSTRUCTION OF	:	
A 96 MW (NOMINAL) SOLAR FACILITY IN	:	
MARION COUNTY, KENTUCKY AND A 40 MW	:	
(NOMINAL) SOLAR FACILITY IN FAYETTE	:	
COUNTY, KENTUCKY AND APPROVAL OF	:	
CERTAIN ASSUMPTIONS OF EVIDENCES OF	:	
INDEBTEDNESS RELATED TO THE SOLAR	:	
FACILITIES AND OTHER RELIEF	:	

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**FAYETTE ALLIANCE, INC.’S MOTION FOR  
LEAVE TO FILE DATA REQUESTS**

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Comes the Fayette Alliance, Inc. (“FA”), 169 N. Limestone Ave., Lexington, Kentucky 40507, by counsel, and pending intervener in this action, respectfully requests leave to file data requests to the applicant, East Kentucky Power Cooperative, Inc. (the “Company”), in accordance with the Order of Procedure entered herein.

In support thereof, FA filed a motion to intervene in the above action which remains pending. The Order of Procedure calls for data requests to be filed on May 31, 2024. In an abundance of caution, FA requests leave/permission to file the attached data requests to the Company subject to any ruling from the Commission on intervention.

Respectfully submitted,

/s/Matt Malone

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Counsel for the Petitioner,  
FAYETTE ALLIANCE, INC.

### **CERTIFICATE OF SERVICE**

I hereby certify that FA's May 31, 2024 electronic filing is a true and accurate copy of FA's pleading and Read 1<sup>st</sup> Document to be filed in paper medium; that the electronic filing has been transmitted to the Commission on May 31, 2024; that an original and one copy of the filing will not be mailed to the Commission given the pandemic orders; that there are currently no parties excused from participation by electronic service; and that, on May 31, 2024, electronic mail notification of the electronic filing is provided to all parties of record.

/s/Matt Malone

ATTORNEY FOR FAYETTE ALLIANCE, INC.