

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

**IN THE MATTER OF:**

<b>ELECTRONIC APPLICATION OF EAST</b>	)	
<b>KENTUCKY POWER COOPERATIVE, INC.</b>	)	
<b>FOR AN AMENDMENT TO ITS</b>	)	
<b>CERTIFICATE OF PUBLIC</b>	)	<b>CASE NO.</b>
<b>CONVENIENCE AND NECESSITY FOR</b>	)	<b>2024-00263</b>
<b>THE CONSTRUCTION OF TRANSMISSION</b>	)	
<b>FACILITIES IN MADISON COUNTY</b>	)	
<b>KENTUCKY</b>	)	

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**MOTION TO INCORPORATE RECORD OF CASE NO. 2022-00314**

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Comes now, East Kentucky Power Cooperative, Inc. (“EKPC”), by counsel, and requests the Commission incorporate the record of Case No. 2022-00314, *Electronic Application of East Kentucky Power Cooperative, Inc. for a (1) Certificate of Public Convenience and Necessity for the Construction of Transmission Facilities in Madison County, Kentucky; and (2) Declaratory Order Confirming that a Certificate of Public Convenience and Necessity is not Required for Certain Facilities* into the proceedings in this case. In support of this Motion, EKPC respectfully states as follows:

1. On October 27, 2022, EKPC filed an application in Case No. 2022-00314 for a certificate of public convenience and necessity (“CPCN”) to construct a transmission line and various other projects in Madison County, Kentucky. Throughout proceedings in Case No. 2022-

00314 EKPC filed testimony<sup>1</sup>, responded to requests for information<sup>2</sup>, a formal hearing was held, and briefed the issues.<sup>3</sup> On February 23, 2023, the Commission issued an order granting EKPC's request for a CPCN and approved of the associated projects.<sup>4</sup>

2. Contemporaneously with this Motion, EKPC is filing an Application for an Amendment to its Certificate of Public Convenience and Necessity for the Construction of Transmission Facilities in Madison County, Kentucky.

3. EKPC believes for a complete administrative record the record of Case No. 2022-00314 should be incorporated by reference into this proceeding.

WHEREFORE, on the basis of the foregoing, EKPC respectfully requests that the Commission incorporate by reference the entirety of the record of Case No. 2022-00314 into this proceeding.

This 17<sup>th</sup> day of September, 2024.

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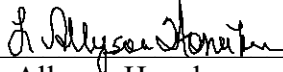
<sup>1</sup> Case No. 2022-00314, *Electronic Application of East Kentucky Power Cooperative, Inc. for a (1) Certificate of Public Convenience and Necessity for the Construction of Transmission Facilities in Madison County, Kentucky; and (2) Declaratory Order Confirming that a Certificate of Public Convenience and Necessity is not Required for Certain Facilities*, Application (filed Oct. 27, 2022).

<sup>2</sup> Case No. 2022-00314, Responses to Commission Staff's First Request for Information (filed Nov. 22, 2024); Responses to Staff's Second Request for Information (filed Dec. 15, 2022); Responses to Staff's Third Request for Information (filed Jan. 23, 2023); Supplemental Response to Staff's Second Request (filed Jan 23, 2023); and Post-Hearing Responses (filed Feb. 2, 2023).

<sup>3</sup> Case No. 2022-00314, EKPC Post-Hearing Brief (filed Feb. 10, 2023).

<sup>4</sup> Case No. 2022-00314, February 23, 2022 Order (Ky. PSC Feb. 23, 2022).

Respectfully submitted,



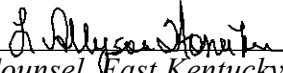
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L. Allyson Honaker  
Brittany H. Koenig  
HONAKER LAW OFFICE, PLLC  
1795 Alysheba Way, Suite 1203  
Lexington, KY 40509  
(859) 368-8803  
allyson@hloky.com  
brittany@hloky.com

*Counsel for East Kentucky Power Cooperative, Inc.*

**CERTIFICATE OF SERVICE**

This is to certify that the foregoing electronic filing was transmitted to the Commission on September 17, 2024; that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding; and that pursuant to prior Commission Orders, no paper copies of this filing will be made.



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*Counsel, East Kentucky Power Cooperative, Inc.*