

**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 SUBMIT**

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Comes now East Kentucky Power Cooperative, Inc. (“EKPC”), by and through counsel, pursuant to the October 11, 2024 Order (“October 11th Order”) of the Kentucky Public Service Commission (“Commission”) and any 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 October 11<sup>th</sup> Order incorporated the record of Case No. 2023-00314<sup>1</sup> into this record and established a procedural schedule. Commission Staff issued its first data requests on October 22, 2024 and EKPC responded to those requests on November 1, 2024. An informal conference was held in the interim by Commission Staff, on October 25, 2024 and a memorandum commemorating the informal conference was entered by Commission Staff on

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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 (Ky PSC Feb. 23, 2023).

October 28, 2024. The October 11<sup>th</sup> Order also provided for a second set of data requests, which was not issued. There are no intervenors in this proceeding. The October 11<sup>th</sup> Order allows EKPC to request or waive a hearing on or before November 25, 2024. EKPC believes that the issues presented in this case are straightforward and have been adequately addressed through the written discovery and discussion at the informal conference. The interests of administrative economy favor avoiding a formal hearing when it would be unlikely to result in the development of any additional facts. Moreover, EKPC is unaware of any issues for which additional clarification might be necessary or advisable. Accordingly, EKPC 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, EKPC respectfully moves to submit this case for an adjudication based upon the existing administrative record and without a formal evidentiary hearing.

This 20th day of November 2024.

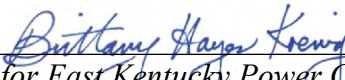
Respectfully submitted,

  
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L. Allyson Honaker  
Brittany Hayes Koenig  
Heather S. Temple  
HONAKER LAW OFFICE, PLLC  
1795 Alysheba Way, Suite 1203  
Lexington, KY 40509  
(859) 368-8803  
allyson@hloky.com  
brittany@hloky.com  
heather@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 November 20, 2024 and that there are no parties that the Commission has excused from participation by electronic means in this proceeding. Pursuant to prior Commission Orders, no paper copies of this filing will be made.

  
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*Counsel for East Kentucky Power Cooperative, Inc.*