

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

IN THE MATTER OF:

AN ELECTRONIC EXAMINATION BY THE)	
PUBLIC SERVICE COMMISSION OF THE)	
ENVIRONMENTAL SURCHARGE MECHANISM)	
OF EAST KENTUCKY POWER COOPERATIVE,)	
INC. FOR THE SIXTH-MONTH EXPENSE)	CASE NO.
PERIODS ENDING MAY 31, 2022, NOVEMBER)	2025-00013
30, 2022, NOVEMBER 30, 2023, MAY 31, 2024,)	
AND NOVEMBER 30, 2024, THE TWO-YEAR)	
EXPENSE PERIOD ENDING MAY 31, 2023, AND)	
THE PASS-THROUGH MECHANISM OF ITS)	
SIXTEEN MEMBER DISTRIBUTION)	
COOPERATIVES)	

MOTION TO SUBMIT

Comes now East Kentucky Power Cooperative, Inc. (“EKPC”), by and through counsel, pursuant to the March 5, 2025 Order of the Kentucky Public Service Commission (“Commission”) and 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 initiated this case and entered an order establishing a procedural schedule on March 5, 2025. The Commission issued its Initial Requests for Information to EKPC on March 5, 2025 and EKPC filed its responses to Commission Staff’s Initial Requests for Information on March 31, 2025. The Commission issued its Second Request for Information to EKPC on April 16, 2025 and EKPC filed its responses to Commission Staff’s Second Request for Information on May 6, 2025. The Commission issued its Third Request for Information to EKPC on May 7, 2025 and EKPC filed its responses to Commission Staff’s Third Request for Information on May 27,

2025. Commission Staff did not issue any further requests for information to EKPC. The March 5, 2025 Order allows EKPC to request or waive a hearing on or before July 3, 2025. EKPC believes that the issues are straightforward and have been adequately addressed through the written discovery. 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 contested issues for which clarification might be necessary or advisable. Accordingly, EKPC does not believe that a formal evidentiary hearing is necessary 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 16th day of June, 2025.

Respectfully Submitted,



L. Allyson Honaker
Heather S. Temple
Meredith L. Cave
Honaker Law Office, PLLC
1795 Alysheba Way, Suite 1203
Lexington, KY 40509
(859) 368-8803
allyson@hloky.com
heather@hloky.com
meredith@hloky.com
Counsel for East Kentucky Power Cooperative, Inc.

CERTIFICATE OF SERVICE

This is to certify that the electronic filing was transmitted to the Commission on June 16, 2025, 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 made.

A handwritten signature in blue ink, reading "Meredith Case". The signature is written in a cursive style with a large initial "M".

Counsel for East Kentucky Power Cooperative, Inc.