

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

IN THE MATTER OF:

ELECTRONIC APPLICATION OF EAST KENTUCKY	)	
POWER COOPERATIVE, INC. FOR APPROVAL TO	)	CASE NO.
AMEND ITS ENVIRONMENTAL COMPLIANCE	)	2025-00053
PLAN, AND RECOVER COSTS PURSUANT TO ITS	)	
ENVIRONMENTAL SURCHARGE, AND OTHER	)	
GENERAL RELIEF	)	

MOTION TO SUBMIT

Comes now East Kentucky Power Cooperative, Inc. (“EKPC”), by and through counsel, pursuant to the July 22, 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:

EKPC filed its application in this matter on July 2, 2025. The Commission established a procedural schedule on July 22, 2025, and issued its Initial Requests for Information to EKPC by on August 12, 2025. EKPC filed its responses to Commission Staff’s Initial Requests for Information on August 27, 2025. Commission Staff issued its Second Requests for Information on September 8, 2025. EKPC filed its responses to Commission Staff’s Second Requests for Information on September 24, 2025. Commission Staff issued its Third Requests for Information on October 3, 2025. EKPC filed its responses to Commission Staff’s Third Requests for Information on October 20, 2025. Commission Staff did not issue any further requests for information to EKPC. The July 22, 2025 Order allows EKPC to request or waive a hearing on or

before November 12, 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. 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 3rd day of November 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 November 3, 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.