COMMONWEALTH OF KENTUCKY BEFORE THE KENTUCKY PUBLIC SERVICE COMMISSION

MOTION TO SUBMIT

Comes now Big Sandy Rural Electric Cooperative Corporation, Blue Grass Energy Cooperative Corporation, Clark Energy Cooperative, Cumberland Valley Electric Inc., Fleming-Mason Energy Cooperative, Inc., Grayson Rural Electric Cooperative Corporation, Inter-County Energy Cooperative Corporation, Jackson Energy Cooperative Corporation, Licking Valley Rural Electric Cooperative Corporation, Nolin Rural Electric Cooperative Corporation, Owen Electric Cooperative, Inc., Salt River Electric Cooperative, Shelby Energy Cooperative, Inc., South Kentucky Rural Electric Cooperative Corporation, and Taylor County Rural Electric Cooperative Corporation by and through counsel, pursuant to the August 15, 2025 Orders, of the Kentucky Public Service Commission ("Commission") and other applicable law, and moves to submit these cases for an adjudication based upon the existing administrative record and without a formal evidentiary hearing, and respectfully state as follows:

- 1. On August 15, 2025, the Commission issued procedural schedules in Case Nos. 2025-00209, 2025-00210, 2025-00211, 2025-00212, 2025-00213, 2025-00214, 2025-00215, 2025-00216, 2025-00217, 2025-00218, 2025-00219, 2025-00220, 2025-00221, 2025-00222, 2025-00223, and 2025-0024.
- 2. Movants filed responses to Commission Staff's Initial Requests for Information on September 10, 2025, September 16, 2025, and September 22, 2025. Movants have also provided updated responses to Commission Staff's First Request for Information on December 5, 2025. The August 15, 2025 Orders the parties to request or waive a hearing on or before December 3, 2025,

December 9, 2025, or December 15, 2025. On December 8, 2025, the Commission conducted a formal hearing in Case No. 2025-00208.¹

4. The Movants believe based upon the proceedings Case No. 2025-00208, the issues in this proceeding have been adequately addressed through the written discovery. The Movants do not believe a formal evidentiary hearing is necessary and move 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, the Movants respectfully move to submit this case for an adjudication based upon the existing administrative record and without a formal evidentiary hearing.

This 10th day of December 2025.

Respectfully Submitted,

Heather S. Temple
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.'s Owner-Members

¹ Electronic Application of East Kentucky Power Cooperative, Inc. for a General Adjustment of Rates, Approval of Depreciation Study, Amortization of Certain Regulatory Assets, and Other General Relief, Case No. 2025-00208.

CERTIFICATE OF SERVICE

This is to certify that the electronic filing was transmitted to the Commission on December

10, 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.

Heather S. Temple
Counsel for East Kentucky Power Cooperative,

Inc.'s Owner-Members