

**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.)	CASE NO.
FOR THE TWO-YEAR EXPENSE PERIOD ENDING)	2025-00266
MAY 31, 2025, AND THE PASS-THROUGH)	
MECHANISM OF ITS SIXTEEN MEMBER)	
DISTRIBUTION COOPERATIVES)	

MOTION TO SUBMIT

Comes now East Kentucky Power Cooperative, Inc., Blue Grass Energy Cooperative Corporation, Big Sandy Rural Electric Cooperative Corporation, Clark Energy Cooperative, Cumberland Valley Electric, Inc., Grayson Rural Electric Cooperative Corporation, Farmers Rural Electric Cooperative Corporation, Fleming-Mason Energy Cooperative, Inc., Inter-County Energy, 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 (collectively the “Movants”), by and through counsel, pursuant to the September 19, 2025 Order of the Kentucky Public Service Commission (“Commission”) and other applicable law, and for their Motion to Submit this case for an adjudication based upon the existing administrative record and without a formal evidentiary hearing, respectfully state as follows:

The Commission initiated this matter, established a procedural schedule, and issued its Initial Requests for Information by virtue of its order dated September 19, 2025. Movants filed

responses to Commission Staff's Initial Requests for Information on October 13, 14, 15, 27, and 28, 2025. Commission Staff issued its Second Requests for Information on October 31, 2025. Movants filed responses to Commission Staff's Second Requests for Information on November 6 and 20, 2025. Commission Staff did not issue any further requests for information to EKPC. Two of the Owner-Members filed additional responses to requests for information on December 12, 2025. The September 19, 2025 Order allows EKPC or any of its Owner-Member Cooperatives or Intervenors to request or waive a hearing on or before January 23, 2026. There are no intervenors in this matter. The Movants believe 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. The Movants are unaware of any contested issues for which clarification might be necessary or advisable. Accordingly, the Movants do not believe that 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 12th day of December 2025.

Respectfully Submitted,

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CERTIFICATE OF SERVICE

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

Heather S. Temple

Counsel for East Kentucky Power Cooperative, Inc.