

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF JACKSON	)	
PURCHASE ENERGY CORPORATION FOR	)	CASE NO.
AUTHORITY TO EXTEND ITS DEBT LIMIT;	)	2026-00033
ESTABLISH A PERPETUAL LINE OF CREDIT;	)	
AND ENTER DEBT OBLIGATIONS	)	

---

**MOTION TO SUBMIT ON RECORD**

---

Comes now Jackson Purchase Energy Corporation (“Jackson Purchase”), by and through counsel, pursuant to the Kentucky Public Service Commission’s (“Commission”) April 8, 2026 Order and other applicable law, and respectfully requests to submit this matter for an adjudication based upon the existing administrative record and without a formal evidentiary hearing. Jackson Purchase respectfully states as follows:

1. On February 12, 2026, Jackson Purchase filed its Application for approval of indebtedness pursuant to KRS 278.300.<sup>1</sup> On March 9, 2026, Commission Staff issued requests for information and Jackson Purchase provided responses.<sup>2</sup> On April 8, 2026, the Commission issued an order extending its review of Jackson Purchase’s Application for an additional 30 days and issued a procedural schedule.<sup>3</sup> The procedural schedule states May 21, 2026, is the last day to request a hearing or submit the matter for a decision on the record.

---

<sup>1</sup> Jackson Purchase filed its Application on February 12, 2026. Due to deficiencies in the Application, it was not accepted for filing until February 20, 2026.

<sup>2</sup> Jackson Purchase’s Responses to DR1 (filed March 20, 2026).

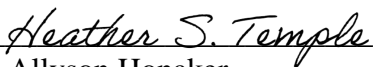
<sup>3</sup> April 8, 2026 Order (Ky PSC April 8, 2026).

2. Jackson Purchase believes the issues in this proceeding have been adequately addressed by the written discovery. Accordingly, Jackson Purchase does not believe a formal evidentiary hearing is necessary in this matter and moves to submit the case for an adjudication based upon the existing administrative record.

WHEREFORE, on the basis of the foregoing, Jackson Purchase respectfully moves to submit this case for an adjudication based upon the existing administrative record and without a formal evidentiary hearing.

This the 20<sup>th</sup> day of May 2026.

Respectfully Submitted,

 \_\_\_\_\_

L. Allyson Honaker  
Heather S. Temple  
Meredith 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 Jackson Purchase Energy Corporation*

**CERTIFICATE OF SERVICE**

This is to certify that the foregoing electronic filing was transmitted to the Commission on May 20, 2026, 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.

*Heather S. Temple*  
\_\_\_\_\_  
*Counsel for Jackson Purchase Energy Corporation*