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August 17, 2012

RECEIVED

AUG 17 2012

PUBLIC SERVICE
COMMISSION

VIA HAND DELIVERY

Jeff DeRouen
Executive Director
Kentucky Public Service Commission
211 Sower Boulevard
Frankfort, KY 40601

RE: The Application of East Kentucky Power Cooperative, Inc. to Transfer Functional Control of Certain Transmission Facilities to PJM Interconnection, LLC
Case No. 2012-00169

Dear Mr. DeRouen:

Enclosed please find and accept for filing the original and ten copies of the Joint Motion of East Kentucky Power Cooperative, Inc., Louisville Gas and Electric Company and Kentucky Utilities Company to Modify Procedural Schedule in the above-referenced matter. Please confirm your receipt of this filing by placing the stamp of your Office with the date received on the enclosed additional copies and return them to me via our officer courier.

Should you have any questions please contact me at your convenience.

Yours very truly,

Kendrick R. Riggs

KRR:ec
Enclosures
cc: Parties of Record

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COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

THE APPLICATION OF EAST KENTUCKY)	
POWER COOPERATIVE, INC. TO TRANSFER)	
FUNCTIONAL CONTROL OF CERTAIN)	CASE NO. 2012-00169
TRANSMISSION FACILITIES TO)	
PJM INTERCONNECTION, LLC)	

JOINT MOTION TO MODIFY PROCEDURAL SCHEDULE

East Kentucky Power Cooperative, Inc. (“EKPC”) and Louisville Gas and Electric Company and Kentucky Utilities Company (collectively, “LG&E - KU”), by and through their respective counsel, move the Public Service Commission (“Commission”) to modify the procedural schedule in this proceeding to permit the further exchange of information between EKPC and LG&E – KU and the subsequent filing of LG&E – KU’s comments from testimony. The grounds supporting movants request for a modification of the Commission’s August 7, 2012 Order are more fully set forth herein. In support of this joint motion, the movants state as follows:

1. On June 27, 2012, LG&E – KU filed a Motion to Modify Procedural Schedule in this proceeding on the grounds that EKPC had not provided sufficient data to permit LG&E – KU to conduct the analyses required to evaluate and provide informed commentary on EKPC’s proposal.

2. On August 2, 2012, EKPC filed its Response to Modify Procedural Schedule stating it did not object to LG&E – KU’s Motion to Modify Procedural Schedule to provide a period of two weeks following receipt of the Deliverability Study and Power Flow Analysis Study from EKPC in order to provide comments or testimony.

3. While the Motion and Response were pending before the Commission, LG&E – KU undertook further negotiations to resolve additional discovery issues. As a result of those discussions, EKPC has committed to provide LG&E – KU, in a readily usable electronic format, the hourly generation dispatch and load forecast output data Charles Rivers Associates produced from its cost-benefit analysis using EKPC’s 2012 load forecast (“CRA Study”) no later than September 7, 2012. In exchange for that commitment, LG&E – KU will, upon receipt of this information, provide EKPC with its current hourly load forecast for the LG&E – KU generation assets and contracted assets, and LG&E – KU’s hourly load forecast for the year 2013 and the peak hourly load forecast for the years 2017 and 2022. EKPC and LG&E – KU have further agreed that their respective study results will be provided to the other party for good faith discussions and possible resolution within a reasonable time before filing those results with the Commission and providing the results to other parties in the case. EKPC expects the CRA Study will not be ready until September 7, 2012 due to the current development of EKPC’s 2012 load forecast.

4. EKPC and LG&E – KU agree that LG&E – KU should be allowed two weeks from the date the CRA study is provided to LG&E-KU to file comments or written testimony with the Commission in this case.

WHEREFORE, East Kentucky Power Cooperative, Inc., Louisville Gas and Electric Company and Kentucky Utilities Company move the Public Service Commission to issue an order amending the August 7, 2012 Order, allowing LG&E – KU to file comments or testimony on EKPC’ s application two weeks after receipt of the CRA information.

Dated: August 17, 2012

Respectfully submitted,

Mark David Goss ^{with} *(permission)*
DER

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Respectfully submitted,

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CERTIFICATE OF SERVICE

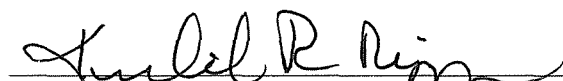
I hereby certify that a copy of the above and foregoing Joint Motion was served upon the following persons by United States first class mail, postage prepaid, on the 17th day of August, 2012:

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