



MAR 25 2013

PUBLIC SERVICE
COMMISSION

March 25, 2013

Mr. Jeff Derouen
Executive Director
Kentucky Public Service Commission
P.O. Box 615
211 Sower Boulevard
Frankfort, KY 40602


Re: Case No. 2012-00486

Dear Mr. Derouen:

Please find enclosed for filing with the Commission in the above-referenced case an original and ten copies of East Kentucky Power Cooperative, Inc.'s Motion for Amendment of Procedural Schedule and Submission for Adjudication Without a Hearing.

Please contact me if you have any questions.

Very truly yours,



on behalf of

Mark David Goss
Counsel

Enclosures

Cc: Parties of Record

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

IN THE MATTER OF:

AN EXAMINATION BY THE PUBLIC SERVICE)	
COMMISSION OF THE ENVIRONMENTAL)	
SURCHARGE MECHANISM OF EAST KENTUCKY)	
POWER COOPERATIVE, INC. FOR THE)	CASE NO.
TWO-YEAR BILLING PERIOD ENDING)	2012-00486
JUNE 30, 2011, FOR THE SIX-MONTH BILLING)	
PERIODS ENDING DECEMBER 31, 2011 AND JUNE)	
30, 2012, AND THE PASS-THROUGH MECHANISM)	
FOR ITS SIXTEEN MEMBER DISTRIBUTION)	
COOPERATIVES)	

**EAST KENTUCKY POWER COOPERATIVE, INC.'S
MOTION FOR AMENDMENT OF PROCEDURAL SCHEDULE AND SUBMISSION
FOR ADJUDICATION ON THE EXISTING CASE RECORD WITHOUT A HEARING**

Comes now East Kentucky Power Cooperative, Inc. ("EKPC"), by and through counsel, and moves the Kentucky Public Service Commission ("Commission") for an Order amending the procedural schedule and submitting the case for adjudication on the existing case record without a hearing. EKPC is also filing this Motion on behalf of each of its 16 Member Distribution Cooperatives, all of which are parties to this proceeding. The Member Distribution Cooperatives are: Big Sandy Rural Electric Cooperative Corporation; Blue Grass Energy Cooperative Corporation; Clark Energy Cooperative, Inc.; Cumberland Valley Electric, Inc.; Farmers Rural Electric Cooperative Corporation; 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 Corporation; Shelby Energy Cooperative, Inc.; South Kentucky Rural Electric Cooperative Corporation; and Taylor County Rural Electric Cooperative Corporation.

In support of this Motion, EKPC states that the Commission entered an Order on November 16, 2012, opening this two-year review proceeding. After a January 3, 2013 Informal Conference with Commission Staff, the Commission entered an Order on January 23, 2013 amending the original procedural schedule. The procedural schedule allowed the Commission Staff to serve data requests on EKPC and its Member Distribution Cooperatives on January 24, 2013.¹ Responses to these data requests were due and filed February 14, 2013. The procedural schedule allowed for EKPC's Member Distribution Cooperatives to serve data requests on EKPC on February 28, 2013. EKPC's member systems did not serve data requests on EKPC, nor has Commission Staff issued additional data requests to EKPC or its Member Distribution Cooperatives.


The remaining procedural schedule allows for intervenor testimony and discovery. There are no intervenors in this proceeding. EKPC and the member systems believe the case record is complete; consequently, this case can be submitted for adjudication on the existing record without a hearing.

WHEREFORE, EKPC respectfully requests that the Commission enter an Order approving an Amendment to the Procedural Schedule and for the Submission for Adjudication on the Existing Record Without a Hearing.

Dated this 25th day of March 2013.

¹ On January 24, 2013, Commission Staff's data request was directed to EKPC's member distribution cooperatives and not to EKPC.

Respectfully submitted,

 on behalf of

Mark David Goss

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Counsel for East Kentucky Power Cooperative, Inc.

CERTIFICATE OF SERVICE

This will certify that a true and correct copy of the foregoing was served, by depositing same in the custody and care of the U.S. Mail, postage pre-paid, on this 25th day of March 2013, addressed to the following:

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Counsel for East Kentucky Power Cooperative, Inc.