

**Goss
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ATTORNEYS AT LAW | PLLC

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September 30, 2016

Via Hand-Delivery

Dr. Talina Mathews, Ph.D.
Executive Director
Kentucky Public Service Commission
P.O. Box 615
211 Sower Boulevard
Frankfort, KY 40602

RECEIVED

SEP 30 2016

PUBLIC SERVICE
COMMISSION

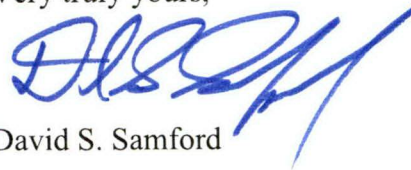
Re: Case No. 2016-00269

Dear Dr. Mathews:

Enclosed, please find for filing with the Commission in the above-referenced case an original and ten (10) copies of East Kentucky Power Cooperative, Inc.'s Motion to Submit for a Decision on the Existing Record. Please return a file-stamped copy of this filing to me.

Do not hesitate to contact me if you have any questions.

Very truly yours,



David S. Samford

Enclosures

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

RECEIVED

SEP 30 2016

In the Matter of:

PUBLIC SERVICE
COMMISSION

THE APPLICATION OF EAST KENTUCKY POWER)
COOPERATIVE, INC. FOR ISSUANCE OF A)
CERTIFICATE OF PUBLIC CONVENIENCE AND)
NECESSITY, APPROVAL OF CERTAIN ASSUMPTION) Case No. 2016-00269
OF EVIDENCES OF INDEBTEDNESS AND)
ESTABLISHMENT OF A COMMUNITY SOLAR TARIFF)

MOTION TO SUBMIT FOR A DECISION ON THE EXISTING RECORD

Comes now East Kentucky Power Cooperative, Inc. (“EKPC”), by counsel, and moves the Kentucky Public Service Commission (“Commission”) to submit the case for a decision on the merits based upon the existing record. In support of this Motion, EKPC respectfully states that the remaining procedural deadlines from the Commission’s August 17, 2016 Scheduling Order are no longer necessary. The deadline for propounding supplemental data requests to EKPC has now passed and neither the Commission Staff nor Kentucky Industrial Utility Customers, Inc. (“KIUC”) issued any such requests. The remaining portions of the procedural schedule concern the filing of testimony by KIUC as the sole intervenor in this case and the taking of any evidentiary discovery arising from said testimony. However, counsel for KIUC has indicated to the undersigned that no intervenor testimony will be filed. Accordingly, the administrative record appears to be complete and the case may be submitted to the Commission for a final decision on the merits based upon the existing administrative record. EKPC hereby waives its right to a hearing so that a decision may be given at the Commission’s earliest opportunity.

WHEREFORE, EKPC respectfully requests that the Commission take the case under submission and issue a final Order regarding same based upon the existing administrative record.

This 30th day of September, 2016.

Respectfully submitted,



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Counsel for East Kentucky Power Cooperative, Inc.

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the foregoing has been served, by delivering same to the custody and care of the U.S. Postal Service, postage pre-paid, this 30th day of September, 2016, addressed to the following:

Mr. Michael L. Kurtz, Esq.
Boehm, Kurtz & Lowry
36 East Seventh Street
Suite 1510
Cincinnati, Ohio 45202



Counsel for East Kentucky Power Cooperative, Inc.