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PUBLIC SERVICE COMMISSION

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF SOUTH KENTUCKY RURAL)
ELECTRIC COOPERATIVE CORPORATION FOR)
APPROVAL OF MASTER POWER PURCHASE AND)
SALE AGREEMENT AND TRANSACTIONS THEREUNDER)

CASE NO.
2018-00050

***MOTION TO INTERVENE OF GRAYSON RURAL
ELECTRIC COOPERATIVE CORPORATION***

Comes now Grayson Rural Electric Cooperative Corporation (hereinafter referred to as “Grayson”), pursuant to KRS 278.210 and 807 KAR 5:001, Section 4(11), and requests that it be granted full intervenor status in the above-captioned proceeding and states in support thereof as follows:

1. Grayson is a distribution electric cooperative located at 109 Bagby Park, Grayson, Kentucky, and is an owner and member of East Kentucky Power Cooperative, Inc. (hereinafter referred to as “East Kentucky”). It is sister member cooperative of East Kentucky with the Plaintiff in this action, South Kentucky Rural Electric Cooperative Corporation (hereinafter referred to as “South Kentucky”). Grayson is incorporated in the Commonwealth of Kentucky and is a corporation presently in good standing.
2. Grayson is engaged in the business of distributing retail electric power to its approximately 15,000 members in a total of six counties with 2,200 miles of primary lines with a service area that is about 60 miles from top to bottom.

3. Grayson, along with South Kentucky, is one of sixteen owner-members of East Kentucky. The sister cooperatives of Grayson and South Kentucky are Big Sandy Rural Electric Cooperative Corporation, Bluegrass Energy Cooperative Corporation, Clark Energy Cooperative Incorporated, Cumberland Valley Electric Incorporated, Farmers Rural Electric Cooperative Corporation, Fleming-Mason Energy Cooperative Incorporated, Inter-County Energy Cooperative Corporation, Jackson Energy Cooperative Corporation, Licking Valley Rural Electric Cooperative Corporation, Nolin Rural Electric Cooperative Corporation, Salt River Rural Electric Cooperative Corporation, Shelby Energy Cooperative Incorporated, and Taylor County Rural Electric Cooperative Corporation. Grayson and its sister cooperatives have entered into a Wholesale Power Contract dated October 1, 1964, Amendment No. 3 thereto, and the Memorandum of Understanding and Agreement Regarding Alternate Power Sources as referenced in South Kentucky's application in the above-captioned proceeding.
4. The substance of the application herein directly affects Grayson insofar as it is a party to the Wholesale Power Contract, Amendment No. 3 and the Memorandum referenced in South Kentucky's application. Any approval of the Master Power Purchase Sale Agreement and transactions thereunder as requested by South Kentucky may have a direct impact on the price that Grayson pays for wholesale power and the corresponding charge it must pass on to its owner-members by virtue of South Kentucky receiving power from an alternate source.
5. It also has a direct substantial impact on Grayson's ability to exercise any and all rights it has under Amendment 3 and the Memorandum of Understanding Regarding Alternate Power Sources should Grayson attempt to negotiate any sort of master power purchase and

sale agreement or other related power contract under the terms of Amendment No. 3 and the Memorandum of Understanding referenced herein. The amount of megawatts requested for approval by South Kentucky has a direct impact on the amount of power that Grayson and its sister cooperatives would have the right to seek to attempt to purchase from a source other than East Kentucky under the terms of the Memorandum and Amendment 3.

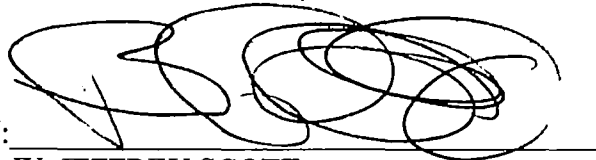
6. Grayson requests to be a full intervenor in this action and request that it be provided with copies of any filed testimony, exhibits, pleadings, applications, and correspondence already within his file or to be filed and that it be certified as a party for purposes of receiving service of any petition for rehearing or petition for judicial review.
7. It is believed that the interest of Grayson's members and Grayson itself will not be otherwise adequately represented or protected by the applicant, South Kentucky, nor any other party hereto unless full intervention is allowed.
8. The movant's mailing address is 109 Bagby Park, Grayson, Kentucky, 41143, and that of its counsel are Hon. W. Jeffrey Scott and Brandon M. Music, P.O. Box 608, Grayson, Kentucky, 41143, along with an electronic mailing address of wjscott@windstream.net.
9. The granting of full intervention by the Commission will allow the Commission to more properly and fully consider the matter subject to approval herein without unduly complicating or disrupting the proceedings as Grayson may be able to help develop evidence of how South Kentucky's application directly impacts the amount of available power under the Memorandum and Amendment No. 3 and how South Kentucky's application affects Grayson and its other sister cooperatives. There is information directly in the possession of Grayson and its sister cooperatives, including the amount of power

that each cooperative serves to its members, that will be of benefit to this Commission. Grayson has a special interest in the subject of this application that is not otherwise adequately presented.

WHEREFORE, for the foregoing reasons Grayson prays for an appropriate order allowing it full intervenor status and for all other relief to which it may be entitled.

RESPECTFULLY SUBMITTED,

W. JEFFREY SCOTT, P.S.C.

A handwritten signature in black ink, appearing to be "W. Jeffrey Scott", written over a horizontal line.

BY:

W. JEFFREY SCOTT
BRANDON M. MUSIC
P.O. BOX 608
GRAYSON, KY 41143
(606) 474-5194

This is to certify that the original, plus 10 copies, of the foregoing was filed with the Public Service Commission at:

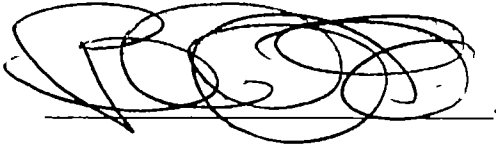
Kentucky Public Service Commission
211 Sower Blvd.
Frankfort, KY 40601

This is to further certify that the foregoing has been served upon the parties of record by mailing a true and correct copy of same to:

Hon. Mark David Goss
Hon. M. Evan Buckley
Goss Samford, PLLC
2365 Harrodsburg Road, Suite 325
Lexington, KY 40504

South Kentucky RECC
925-929 N. Main Street
P.O. Box 910
Somerset, KY 42502-0910

This 21st day of February, 2018.

A handwritten signature in black ink, consisting of several overlapping loops and a horizontal line at the bottom, positioned above a horizontal line.