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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)	CASE NO.
FOR APPROVAL OF MASTER POWER)	2018-00050
PURCHASE AND SALE AGREEMENT AND)	
TRANSACTIONS THEREUNDER)	

MOTION TO INTERVENE OF
JACKSON ENERGY COOPERATIVE CORPORATION

Pursuant to KRS 278.310, 807 KAR 5:001, Section 4(11) and Order of this Commission, Jackson Energy Cooperative, Inc. (“JEC”), hereby moves the Commission to be granted full intervenor status in this matter. In support of this motion, JEC states as follows:

1. JEC is a not-for-profit rural electric distribution cooperative organized pursuant to KRS Chapter 279. JEC is incorporated in the Commonwealth of Kentucky and is currently in good standing.

2. JEC is engaged in the business of distributing retail electric energy to its members located primarily in the Counties of Jackson, Laurel, Clay, Lee, Owsley, Rockcastle and Estill. JEC is one of sixteen owner-members of East Kentucky Power Cooperative (“EKP”). JEC along with the other fifteen owner-members have each entered into a Wholesale Power Contract dated October 1, 1964 with EKP, including Amendment No. 3 thereto, and a subsequent memorandum of understanding regarding Alternate Power Sources as referenced in South Kentucky Rural Electric Cooperative’s Application in this matter.

3. The issues being decided by the Commission in this matter will have a significant impact on the rates paid by JEC and its members for electricity due to the likelihood of cost shifting

by EKP of environmental surcharges and the possibility of an increase in the base rates of EKP due to the loss of load from South Kentucky.

4. The attorney for JEC authorized to represent it in this proceeding and to take service of all documents is:

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5. The position of JEC and its members is not and cannot be adequately represented by any existing party. JEC intends to play a constructive role in the resolution of this matter, and JEC's participation will not unduly prejudice any party.

WHEREFORE, JEC requests that it be granted full intervenor status in the above captioned proceedings.

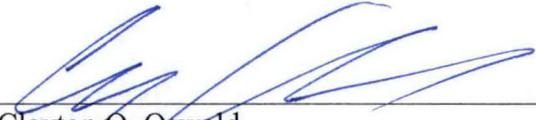


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Counsel for Jackson Energy Cooperative

CERTIFICATE OF SERVICE

The undersigned counsel hereby certifies that the original and ten copies of this pleading were served via hand delivery at the Kentucky Public Service Commission with copies sent to attorneys of record via electronic mail.

Dated: February 23, 2018



Clayton O. Oswald
Attorney for Jackson Energy Cooperative