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PUBLIC SERVICE
COMMISSION

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

THE APPLICATION OF SOUTH KENTUCKY RURAL)
ELECTRIC COOPERATIVE CORPORATION FOR) Case No. 2018-00050
APPROVAL OF MASTER POWER PURCHASE AND)
SALE AGREEMENT AND TRANSACTIONS THEREUNDER)

MOTION TO INTERVENE OF
TAYLOR COUNTY RURAL ELECTRIC COOPERATIVE CORPORATION

Pursuant to K.R.S. §278.310 and 807 KAR 5:001, Section 4(11), Taylor County RECC (“Taylor”), requests that it be granted full intervenor status in the above-captioned proceeding and states in support thereof as follows:

1. Taylor is a not-for-profit, member-owned rural electric distribution cooperative organized under KRS Chapter 279. Taylor is incorporated in the Commonwealth of Kentucky, and attests that it is presently a Kentucky corporation in good standing.
2. Taylor is engaged in the business of distributing retail electric power to approximately 28,000 members located within 9 counties in south central Kentucky. Taylor is one (1) of sixteen (16) owner-members of East Kentucky Power Cooperative, Inc. (“EKP”). Taylor and EKP (as well as each other Owner-Member distribution cooperative and EKP, respectively) have entered into the Wholesale Power Contract dated October 1, 1964, Amendment No. 3, and the Memorandum of Understanding and Agreement regarding Alternate Power Sources, all as referenced in South Kentucky Rural Electric Cooperative Corporation’s Application in the above-captioned proceeding.

3. The matters being decided by the Commission in this case will have a significant impact on the rates paid by Taylor and its members for electricity. The attorney for Taylor authorized to represent Taylor in this proceeding and to accept service of all documents is:

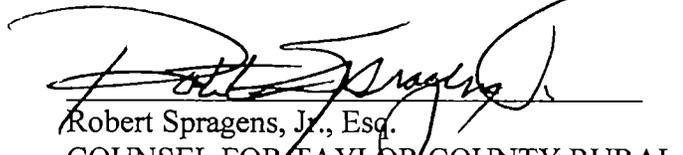
Robert Spragens, Jr., Esq.
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4. The position of Taylor and its members cannot be adequately represented by any existing party. Taylor intends to play a constructive role in the Commission's decision-making process herein and Taylor's participation will not unduly prejudice any party.

WHEREFORE, Taylor County Rural Electric Cooperative Corporation requests that it be granted full intervenor status in the above captioned proceedings.

Respectfully Submitted,

Robert Spragens, Jr., Esq.
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COUNSEL FOR TAYLOR COUNTY RURAL
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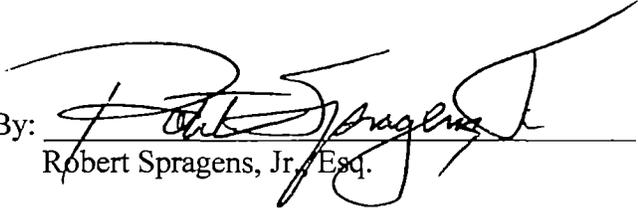
CERTIFICATE OF SERVICE

I hereby certify that the above Motion to Intervene was served by U. S. Mail on the 21st day of February, 2018, to the following:

Ms. Gwen R. Pinson, Executive Director (Original and 10 copies via US Express Mail)
Kentucky Public Service Commission
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Frankfort, Kentucky 40602-0615

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Hon. M. Evan Buckley
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By: 

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