

HURT, Deckard & MAY PLLC

William C. Hurt, Jr.
William H. May, III +
Michael D. Kalinyak

THE EQUUS BUILDING
127 WEST MAIN STREET
LEXINGTON, KENTUCKY 40507

Telephone - (859) 254-0000
Facsimile - (859) 254-4763
mmalone@hdmfirm.com

Matthew R. Malone
Aaron D. Reedy
James L. Deckard ++

+Also licensed in Indiana
++Also licensed in Tennessee

March 27, 2018

Via Hand-Delivery

Hon. Gwen R. Pinson, Executive Director
Kentucky Public Service Commission
211 Sower Boulevard
Frankfort, Kentucky 40602

RE: *Case No. 2018-00050, In the Matter of: The Application of South
Kentucky Rural Electric Cooperative Corporation for Approval of Master
Power Purchase and Sale Agreement and Transactions Thereunder*

Dear Ms. Pinson:

Please find enclosed and accept for filing on behalf of South Kentucky Rural Electric Cooperative Corporation (SKRECC) an original and ten (10) copies of South Kentucky Rural Electric Cooperative Corporation's motion to deviate from 807 KAR 5:001 § 8 in requesting electronic filing procedures after case initiation.

I appreciate your assistance with this matter, and please do not hesitate to contact me with any questions or concerns.

Regards,



Matthew Malone

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MAR 27 2018

PUBLIC SERVICE
COMMISSION

C: File

Enc.

Counsel of Record

MAR 27 2018

PUBLIC SERVICE
COMMISSION**COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION**

In the matter of: : CASE NO: 2018-00050

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

**MOTION BY SOUTH KENTUCKY RURAL ELECTRIC COOPERATIVE
CORPORATION TO DEVIATE FROM 807 KAR 5:001 § 8 IN REQUESTING
ELECTRONIC FILING PROCEDURES AFTER CASE INITIATION**

Pursuant to 807 KAR 5:001 § 22, the Applicant, South Kentucky Rural Electric Cooperative Corporation (“South Kentucky”), respectfully requests that the Kentucky Public Service Commission (“Commission”) permit deviation from its rule, 807 KAR 5:001 §8(2), that a Notice of Election of Use of Electronic Filing Procedures be filed at least seven (7) days prior to submission of an application to initiate a proceeding and enter an order or otherwise direct that the procedures established in Section 8 be used in lieu of other procedures established in 807 KAR 5:001. There is good cause to support the requested deviation and the use of electronic filing procedures, as follows:

1. South Kentucky filed its application herein on January 31, 2018 which was assigned case no. 2018-00050. South Kentucky did not present a Notice of Election of Use of Electronic Filing Procedures either prior to or concurrent with submission of its application.

2. After filing its application, most, if not all, of the other rural electric cooperative corporations in the Commonwealth have intervened in this matter along with the Attorney General and Nucor Steel intervening in this matter. The individual parties involved in this

case total approximately 20 entities. The level of intervention and corresponding discovery has exceeded expectations. The intervenors combined data requests exceeded hundreds of data requests on their first deadline for data requests and many more are expected in their supplemental requests.

3. The number of entities in this matter and the level and amount of discovery are changes from the situation at the time the application was filed and provide good cause for allowing a post initiation request for use of electronic filing procedures. It would be more efficient and useful to use the electronic filing procedures established in 807 KAR 5:001 § 8 rather than continuing with paper filing given the voluminous nature of discovery and the number of parties.

4. Attached hereto South Kentucky submits a signed Notice of Election of Use of Electronic Filing Procedures.

5. After the recent change in counsel for South Kentucky, undersigned counsel has also reached out to intervenor counsel with regard to the above motion and the Attorney General is supportive of South Kentucky's request for modify this case to electronic filing, no other party has expressed an opinion about this motion.

Wherefore, South Kentucky respectfully requests a deviation from 807 KAR 5:001 § 8(2) for good cause shown and that the Commission enter an Order or other direct that the procedure established in § 8 be used in lieu of other procedures established in 807 KAR 5:001.

Respectfully submitted,



Matthew R. Malone
William H. May, III.
Hurt, Deckard & May PLLC
127 West Main Street
Lexington, Kentucky 40507
(859) 254-0000 (office)
(859) 254-4763 (facsimile)
mmalone@hdmfirm.com
bmay@hdmfirm.com

Scott B. Grover
S. Michael Madison
Balch & Bingham, LLP
1710 Sixth Ave. North
Birmingham, Alabama 35203
(205) 251-8100
(205) 488-5660
sgrover@balch.com
mmadison@balch.com

Counsel for the Petitioner,

**SOUTH KENTUCKY RURAL ELECTRIC
COOPERATIVE CORPORATION**

CERTIFICATE OF SERVICE

Pursuant to 807 KAR 5:001 Section 6, the undersigned certifies that consistent with 807 KAR 5:001 Section 4(8)(d)(3), a copy of this document has been electronically served upon the following:

Kent A. Chandler, Esq.
Rebecca W. Goodman, Esq.
ASSISTANT ATTORNEYS GENERAL
Kent.Chandler@ky.gov
Rebecca.Goodman@ky.gov

W. Patrick Hauser, Esq.
W. PATRIC HAUSER, PSC
phauser@barbourville.com

Michael L. Kurtz, Esq.
BOEHM, KURTZ & LOWRY
mkurtz@bkllawfirm.com

James M. Crawford, Esq.
Ruth H. Baxter, Esq.
Jake A. Thompson, Esq.
CRAWFORD & BAXTER, P.S.C.
Jcrawford@cbkylaw.com
Rbaxter@cbky.com
Jthompson@cbky.com

W. Jeffrey Scott, Esq.
Brandon M. Music, Esq.
W. JEFFREY SCOTT, P.S.C.
wjscott@windstream.net

Mark David Goss, Esq.
Goss Samford, PLLC
22365 Harrodsburg Road, Suite B325
Lexington, Kentucky 40504
mdgoss@gosssamfordlaw.com

James M. Miller, Esq.
R. Michael Sullivan, Esq.
SULLIVAN MOUNTJOY, PSC
jmiller@smlegal.com
msullivan@smlegal.com

John Doug Hubbard, Esq.
Jason P. Floyd, Esq.
FULTON, HUBBARD & HUBBARD, PLLC
jdh@bardstown.com
jpf@bardstown.com

Clayton O. Oswald, Esq.
TAYLOR, KELLER & OSWALD, PLLC
coswald@tkolegal.com

Robert Spragens, Jr., Esq.
SPRAGENS & HIDGON, P.S.C.
rspragens@spragenhigdonlaw.com

David T. Royse, Esq.
RANDSELL ROACH & ROYSE PLLC

david@rrrfirm.com

David A. Smart, Esq.
Roger R. Cowden, Esq.
EKPC
David.smart@ekpc.coop
Roger.cowden@ekpc.coop

This 27th day of March, 2018.



ATTORNEY FOR SKRECC

NOTICE OF ELECTION OF USE OF ELECTRONIC FILING PROCEDURES

(Complete All Shaded Areas and Check Applicable Boxes)

In accordance with 807 KAR 5:001, Section 8, South Kentucky Rural Electric Cooperative Corporation gives notice of its intent [REDACTED] to use the electronic filing procedures set forth in that regulation.

South Kentucky Rural Electric Cooperative Corporation further states that:

- | | Yes | No |
|--|-------------------------------------|-------------------------------------|
| 1. It requests that the Public Service Commission assign a case number to the intended application and advise it of that number as soon as possible; Case No. 2018-00050 | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| 2. It or its authorized representatives have registered with the Public Service Commission and are authorized to make electronic filings with the Public Service Commission; | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 3. Neither it nor its authorized representatives have registered with the Public Service Commission for authorization to make electronic filings but will do so no later than seven days before the date of its filing of its application for rate adjustment; | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| 4. It or its authorized agents possess the facilities to receive electronic transmissions; | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 5. The following persons are authorized to make filings on its behalf and to receive electronic service of Public Service Commission orders and any pleadings filed by any party or the Public Service Commission Staff: | | |

Name	Electronic Mail Address
Matthew Malone	mmalone@hdmfirm.com
Scott Grover	sgrover@balch.com
William May	bmay@hdmfirm.com

6. It and its authorized representatives listed above have read and understand the procedures for electronic filing set forth in 807 KAR 5:001 and will fully comply with those procedures unless the Public Service Commission directs otherwise.

Signed 
Name: Matthew Malone
Title: Attorney
Address: 127 W. Main Street
Lexington, Kentucky 40507
Telephone Number: 859-254-0000