

# Goss ■ Samford PLLC



Attorneys at Law

Mark David Goss  
(859) 368-7740  
mdgoss@gosssamfordlaw.com

RECEIVED

JAN 28 2016

PUBLIC SERVICE  
COMMISSION

January 28, 2016

**VIA HAND DELIVERY**

Mr. Jeff Derouen  
Executive Director  
Kentucky Public Service Commission  
P.O. Box 615  
211 Sower Boulevard  
Frankfort, KY 40602

Re: *In the Matter of: The Application of East Kentucky Power Cooperative, Inc. for Approval of the Acquisition of Existing Combustion Turbine Facilities form Bluegrass Generation Company, LLC at the Bluegrass Generating Station in LaGrange, Oldham County, Kentucky and for Approval of the Assumption of Certain Evidences of Indebtedness*  
**PSC Case No. 2015-00267**

Dear Mr. Derouen:

Please find enclosed for filing with the Commission an original and ten copies of a Motion for Extension of Time on behalf of East Kentucky Power Cooperative, Inc. ("EKPC"). Please return a file-stamped copy of this filing to my office, and please do not hesitate to contact me with any questions or concerns.

Very truly yours,

Mark David Goss

Enclosure

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

In the Matter of:

THE APPLICATION OF EAST KENTUCKY POWER )  
COOPERATIVE, INC. FOR APPROVAL OF THE )  
ACQUISITION OF EXISTING COMBUSTION TURBINE )  
FACILITIES FROM BLUEGRASS GENERATION ) Case No. 2015-00267  
COMPANY, LLC AT THE BLUEGRASS GENERATING )  
STATION IN LAGRANGE, OLDHAM COUNTY, KENTUCKY )  
AND FOR APPROVAL OF THE ASSUMPTION OF CERTAIN )  
EVIDENCES OF INDEBTEDNESS )

---

**MOTION FOR EXTENSION OF TIME**

---

Comes now East Kentucky Power Cooperative, Inc. (“EKPC”), by and through counsel, and for its motion requesting a brief extension of time to comply with a provision of the Commission’s Order entered in this matter on December 1, 2015 (the “Order”), respectfully states as follows:

1. By way of the Order, the Commission approved EKPC’s requests to acquire the Bluegrass Station and to assume the evidences of indebtedness associated with the Bluegrass Station acquisition.

2. EKPC consummated the acquisition of the Bluegrass Station on December 29, 2015. In accordance with ordering paragraph 2 of the Order, EKPC provided written notification of the closing to the Commission on January 5, 2016.

3. Pursuant to ordering paragraph 5 of the Order, EKPC must file, within thirty (30) days of the closing of the Bluegrass Station transaction, the journal entries reflecting how the transaction was recorded.

4. EKPC has worked diligently to finalize its bookkeeping and financial records for the 2015 fiscal year, but its efforts have not yet been concluded. The journal entries related to EKPC's acquisition of the Bluegrass Station are a part of this year-end process, and a brief extension of time to submit the journal entries is requested to ensure EKPC provides the Commission with accurate and appropriate information related to the acquisition's accounting.

WHEREFORE, in light of the foregoing, EKPC requests that the deadline by which it must file the subject journal entries be extended for a period of fifteen (15) days, *to wit*, until February 12, 2016.

This 28<sup>th</sup> day of January, 2016.

Respectfully submitted,



---

Mark David Goss  
David S. Samford  
M. Evan Buckley  
GOSS SAMFORD, PLLC  
2365 Harrodsburg Road, Suite B-235  
Lexington, KY 40504  
(859) 368-7740  
mdgoss@gosssamfordlaw.com  
david@gosssamfordlaw.com  
ebuckley@gosssamfordlaw.com

*Counsel for East Kentucky Power Cooperative, Inc.*

**CERTIFICATE OF SERVICE**

This is to certify that a true and correct copy of the foregoing was deposited in the custody and care of the U.S. Mail, postage prepaid, on this the 28<sup>th</sup> day of January, 2016, addressed to the following:

Rebecca Goodman  
Lawrence W. Cook  
Assistant Attorneys General  
1024 Capital Center Drive, Suite 200  
Frankfort, KY 40601-8204

Allyson C. Sturgeon  
Senior Corporate Attorney  
LG&E and KU Services Company  
220 West Main Street  
Louisville, Kentucky 40202

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



---

*Counsel for East Kentucky Power Cooperative, Inc.*