

# JOE F. CHILDERS & ASSOCIATES

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Joe F. Childers, Esquire  
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RECEIVED

December 19, 2016

DEC 20 2016

Kentucky Public Service Commission  
211 Sower Boulevard  
P.O. Box 615  
Frankfort, Kentucky 40602-0615

Public Service  
Commission

RE: *In the Matter of: An Investigation of the Gas Costs of B&H Gas Company*  
Case No. 2015-00367

To Whom It May Concern:

Enclosed herewith are eleven (11) copies of the Motion of B&H Gas Company and B&S Oil and Gas Company for an Extension of Time to File Responses to the Post-Hearing Data Request as well as a stamped, self-addressed envelope to be returned to us with a file stamped copy of the Motion.

Please call me at (859) 253-9824 if you have any questions.

Thank you for your prompt attention to, and compliance with this matter.

Sincerely,



Joe F. Childers

JFC/jt

COMMONWEALTH OF KENTUCKY

RECEIVED

BEFORE THE PUBLIC SERVICE COMMISSION

DEC 20 2016

Public Service  
Commission

In the Matter of

AN INVESTIGATION OF THE GAS COSTS OF )  
B&H GAS COMPANY PURSUANT TO KRS )  
278.2207 AND THE WHOLESALE GAS PRICE IT )  
IS CHARGED BY ITS AFFILIATE, B&S OIL AND )  
GAS COMPANY, PURSUANT TO KRS 278.274 )

CASE NO.  
2015-00367

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MOTION OF B&H GAS COMPANY AND  
B&S OIL AND GAS COMPANY FOR AN EXTENSION  
OF TIME TO FILE RESPONSES TO THE POST-HEARING DATA REQUESTS

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Comes B&H Gas Company (“B&H”), and B&S Oil and Gas Company (“B&S”) (together “Movants”), by and through counsel, and respectfully move the Commission for an extension of time to file their response to the Post-Hearing Data Requests received from the Commission staff on or about December 8, 2016.

The Data Requests seek substantial information which by necessity comes from the certified public accountant who prepares Movants’ tax filings.<sup>1</sup> Movants’ representative has been informed that the CPA’s office is short-staffed during this holiday season and that office will not be able to comply with the requests before the middle of January, 2017. Likewise, as pointed out repeatedly at the hearing, the Movants are very small businesses employing only one clerical aid who assists Mr. Rife with all of the office needs. Time spent responding to the data requests takes time away from the core business of Movants.

<sup>1</sup> For example, the information on lessees and owners of surface and mineral rights for the wells operated by B&S and for royalty payments made as a result of production from the wells is information that must be obtained from the CPA.

Accordingly, Movants respectfully request an extension of time from December 23, 2016 to January 15, 2017 within which to comply with the Data Requests served by Commission staff.

Respectfully submitted,

  
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JOE F. CHILDERS

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**CERTIFICATE OF SERVICE**

I hereby certify that a true copy of the foregoing motion has been served on the Attorney

General by mailing the same to:

Larry Cook, Esq.  
Rebecca W Goodman, Esq.  
Assistant Attorneys General  
Office of the Attorney General Utility & Rate  
1024 Capital Center Drive  
Suite 200  
Frankfort, Kentucky 40601-8204

On this the 19<sup>th</sup> day of December, 2016.

  
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JOE F. CHILDERS