

NOV 2 1 2016

PUBLIC SERVICE COMMISSION

David S. Samford david@gosssamfordlaw.com (859) 368-7740

November 21, 2016

VIA HAND DELIVERY

Ms. Talina Matthews, Ph.D. Executive Director Kentucky Public Service Commission 211 Sower Boulevard Frankfort, Kentucky 40601

RE: In the Matter of: Application of Farmers Rural Electric Cooperative Corporation for an Increase in Retail Rates - Case No. 2016-00365

Dear Ms. Matthews:

Please find enclosed for filing with the Commission the original and ten copies of Farmers Rural Electric Cooperative Corporation's Motion for an Extension of Time. Please return a file-stamped copy of this filing to my office.

Please let me know if you have any questions.

Sincerely,

David S. Samford

Enc.

COMMONWEALTH OF KENTUCKY

RECEIVED

BEFORE THE PUBLIC SERVICE COMMISSION

NOV 2 1 2016

PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF FARMERS RURAL)	
LECTRIC COOPERATIVE)	CASE NO.
CORPORATION FOR AN INCREASE IN)	2016-00365
RETAIL RATES	j	

MOTION FOR AN EXTENSION OF TIME

Comes now Farmers Rural Electric Cooperative Corporation ("Farmers RECC"), by counsel, and hereby moves the Kentucky Public Service Commission ("Commission") for a brief, seven day extension of time in which to respond to data requests in the above-captioned case, and, in support of said motion, respectfully states as follows:

On October 14, 2016, Farmers RECC filed a notice of intent to file a rate case. On November 10, 2016, the Commission issued its first set of data requests. Farmers RECC's responses are due "on or before either 14 days after the initial submission of the rate application or 28 days after the date of this request, whichever is later." Farmers RECC filed its rate application on November 15, 2016, which makes its responses to the Commission's first data requests due on December 8, 2016. Due to the Thanksgiving holiday and conflicting schedules for Farmers RECC's management and consultants, Farmers RECC requests an additional seven days in which to tender responses to the Commission's data requests. Thus, Farmers RECC's responses would be due on December 15, 2016. Granting said motion will not result in prejudice. No scheduling order has yet been issued in this case and, as of this date, no party has requested to intervene.

WHEREFORE, Farmers RECC respectfully moves the Commission to grant it an additional seven days – until December 15, 2016 – in which to tender responses to the Commission's November 10, 2016 data requests.

This 21st day of November, 2016.

Respectfully submitted,

Mark David Goss

David S. Samford

GOSS SAMFORD, PLLC

2365 Harrodsburg Road, Suite B325

Lexington, KY 40504

(859) 368-7740

mdgoss@gosssam fordlaw.com

david@gosssamfordlaw.com

Counsel for Farmers Rural Electric Cooperative Corporation