

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

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PUBLIC SERVICE
COMMISSION

IN THE MATTER OF:

**THE PETITION OF KENTUCKY FRONTIER
GAS, LLC FOR A DECLARATORY ORDER**

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**PSC CASE NO.
2016-00287**

**MOTION FOR AN EXTENSION OF TIME TO FILE
RESPONSE TO KENTUCKY FRONTIER GAS, LLC'S
PETITION FOR A DECLARATORY ORDER**

Pursuant to 807 KAR 5:001, Section 19, First Baptist Church of Forest Hills ("First Baptist Church") requests that it be granted an extension of fifteen (15) days within which to file a response to Kentucky Frontier Gas, LLC's ("Kentucky Frontier") petition for a declaratory order. As grounds for this motion First Baptist Church states as follows:

1. On August 3, 2016, Kentucky Frontier filed a Petition for a Declaratory Order with the Commission.
2. Pursuant to 807 KAR 5:001 Section 19, First Baptist Church had twenty-one (21) days from the date of the filing to respond to Kentucky Frontier's petition. However, according to this same section, the Commission can order a different response period.
3. First Baptist Church has recently retained counsel to aid it in this matter, and was previously unaware of the twenty-one (21) response period. First Baptist Church will be materially affected by the decision of the Commission in this matter.
4. Granting a fifteen (15) day extension from the date the Response was originally due in this matter will not unduly prejudice any other party to this proceeding and First Baptist Church's

interest cannot be adequately protected by any other party to this proceeding. In fact, First Baptist Church's Response is being tendered herewith.

WHEREFORE, First Baptist Church respectfully requests that it be granted a fifteen (15) day extension within which to file a response to Kentucky Frontier's petition.

Respectfully submitted,



Mark David Goss
L. Allyson Honaker
Goss Samford, PLLC
2365 Harrodsburg Road, Suite B-325
Lexington, KY 40504
(859) 368-7740
mdgoss@gosssamfordlaw.com
allyson@gosssamfordlaw.com

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the foregoing has been served, by delivering same to the custody and care of the U.S. Postal Service, postage pre-paid, this 7th day of September, 2016, addressed to the following: 8th

John N. Hughes
124 West Todd Street
Frankfort, KY 40601
Counsel for Kentucky Frontier Gas, LLC



Counsel for First Baptist Church of Forest Hills