COMMONWEALTH OF KENTUCKY

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BEFORE THE PUBLIC SERVICE COMMISSION

FEB 6 2017

In the Matter of:

PUBLIC SERVICE COMMISSION

APPLICATION OF NOLIN RURAL)	CASE NO.
ELECTRIC COOPERATIVE CORPORATION)	2016-00367
FOR A GENERAL RATE INCREASE	j	

ATTORNEY GENERAL'S RESPONSE TO NOLIN RURAL ELECTRIC COOPERATIVE CORPORATION'S MOTION FOR EXTENSION OF TIME

The Attorney General of the Commonwealth of Kentucky, by and through his Office of Rate Intervention, submits the following Response to Nolin Rural Electric Cooperative Corporation's ("Nolin" or "Company") Motion for Extension of Time.¹

Nolin filed its Motion for Extension of Time with the Commission on February 3, 2017.² The Company is requesting an additional ten (10) days to file responses to both the Commission and the Attorney General's discovery requests.³ If the Commission grants Nolin's request, then the Company's deadline to file responses to the initial discovery would move from February 7, 2017 to February 17, 2017.⁴

The Attorney General does not object to the Commission granting Nolin's request, as long as the Commission amends the remainder of the procedural schedule accordingly and allows ten (10) additional days for the Attorney General to file his supplemental discovery. If the Commission grants Nolin until February 17, 2017 to file its responses to discovery, but does not amend the procedural schedule, then the Attorney General would only have two business days to review the voluminous responses as well as draft and file his supplemental discovery requests on

¹ Nolin Rural Electric Cooperative Corporation's Motion for Extension of Time, (February 3, 2017).

² *Id*.

³ *Id.*, at 1.

⁴ *Id*.

February 21, 2017.⁵ This result would be extremely burdensome and prejudicial to the Attorney General.

Wherefore, if the Commission grants Nolin's Motion for Extension of Time, then the Attorney General respectfully requests that the procedural order be amended accordingly. In the alternative, if the Commission were not inclined to amend the procedural order, then the Attorney General objects to Nolin's Motion for Extension of Time since it would be overly burdensome and prejudicial to his case.

Respectfully submitted,

ANDY BESHEAR

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⁵ Case No. 2016-00367, Procedural Order (January 13, 2017).

Certificate of Service and Filing

Counsel certifies that an original and ten photocopies of the foregoing were served and filed by hand delivery to Dr. Talina R. Mathews, Executive Director, Public Service Commission, 211 Sower Boulevard, Frankfort, Kentucky 40601; counsel further states that true and accurate copies of the foregoing were mailed via First Class U.S. Mail to:

Honorable John J. Scott Attorney for Nolin Rural Electric Cooperative Corporation 108 E. Poplar Street P.O. Box 389 Elizabethtown, Kentucky 42702-0389

Mark David Goss M. Evan Buckley Goss Samford, PLLC Attorneys for Nolin Rural Electric Cooperative Corporation 2365 Harrodsburg Road, Suite B-325 Lexington, Kentucky 40504

this 6th day of February, 2017.

Ingla M. Doad

Assistant Attorney General