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February 20, 2017

**RECEIVED**

**FEB 20 2017**

**PUBLIC SERVICE  
COMMISSION**

**VIA HAND DELIVERY**

Ms. Talina Mathews  
Executive Director  
Kentucky Public Service Commission  
P.O. Box 615  
211 Sower Boulevard  
Frankfort, KY 40602

Re: IN THE MATTER OF APPLICATION OF NOLIN RURAL ELECTRIC  
COOPERATIVE CORPORATION FOR AN ADJUSTMENT OF EXISTING  
RATES  
**Case No. 2016-00367**

Dr. Mathews:

Please find enclosed and accept for filing on behalf of Nolin Rural Electric Cooperative Corporation ("Nolin"): (i) an original and ten (10) copies of Nolin's Response to the Attorney General's Initial Request for Information; and (ii) an original and ten copies of Nolin's Motion for Leave to Late-File said Response. Please return a file-stamped copy of each submission to me.

I appreciate your assistance with this matter, and please do not hesitate to contact me with any questions or concerns.

Very truly yours,



|| M. Evan Buckley

Enclosures

**RECEIVED**

**FEB 20 2017**

**PUBLIC SERVICE  
COMMISSION**

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

**IN THE MATTER OF:**

**APPLICATION OF NOLIN RURAL ELECTRIC )  
COOPERATIVE CORPORATION FOR AN ) CASE NO. 2016-00367  
ADJUSTMENT OF EXISTING RATES )**

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**MOTION FOR LEAVE TO LATE-FILE RESPONSE TO  
INTERVENOR'S REQUEST FOR INFORMATION**

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Comes now Nolin Rural Electric Cooperative Corporation ("Nolin"), by and through counsel, and hereby moves the Kentucky Public Service Commission ("Commission") for leave to late-file its response to the initial request for information propounded by the Attorney General of the Commonwealth of Kentucky, by and through his Office of Rate Intervention (the "AG"), in the above-styled matter. In support of this request, Nolin states as follows:

1. Pursuant to Commission Order entered February 8, 2017, Nolin was granted an extension of time, until February 17, 2017, to file its responses to the requests for information propounded by Commission Staff and the AG, respectively, on or about January 24, 2017.

2. On February 16, 2017, Nolin tendered and served its responses to both Commission Staff's second request for information and the AG's initial request for information. The following afternoon, on February 17, 2017, Nolin contacted the Commission's offices and inquired as to the status of its response to the AG's initial request for information, as that filing, unlike its response to Commission Staff's second request for information, had not been posted to the Commission's online docket for this matter. Nolin was then informed that its response to the AG's initial request for information contained certain errors, including ostensibly missing pages and possibly

misidentified or improperly redacted confidential information. In order to address these issues, Nolin immediately retrieved the documents it tendered in response to the AG's initial request for information and has worked diligently to rectify its deficiencies. Contemporaneously with this motion, Nolin has tendered to the Commission and served upon the AG its corrected response to the AG's initial request for information.

3. Nolin respectfully requests that the Commission permit the filing of Nolin's corrected response to the AG's initial request for information one (1) business day after the deadline established in the Commission's Order of February 8, 2017. Through oversight, inadvertence, and/or excusable neglect, Nolin mistakenly tendered a version of its response that was not complete or finalized; despite its efforts in good faith, Nolin was unable to correct its mistake before the applicable deadline. Nolin requests that the Commission and its Staff accept Nolin's corrected response and its apologies.

4. Nolin does not believe its requested relief will unreasonably impact this case or otherwise result in prejudice. Nolin's original response to the AG's initial request for information, which was hand-delivered to the AG on February 16, 2017, contained substantially the same substantive material as the version it now tenders and serves; thus, Nolin believes that no revision is necessary to the procedural schedule for this matter. However, to the extent the AG or the Commission believes otherwise, Nolin does not object and will work diligently to ensure the timely progression of this case.

WHEREFORE, Nolin respectfully requests that the Commission enter an Order granting it one (1) additional business day to file its response to the AG's initial request for information.

Dated this 20<sup>th</sup> day of February, 2017.

Respectfully submitted,



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*Co-Counsel for Nolin RECC*

**CERTIFICATE OF SERVICE**

Pursuant to 807 KAR 5:001 Section 6, the undersigned certifies that, consistent with 807 KAR 5:001 Section 4(8)(d)(3), a copy of this document has been hand-delivered to the following:

Hon. Angela M. Goad  
Hon. Rebecca W. Goodman  
Assistant Attorneys General  
700 Capital Avenue, Suite 20  
Frankfort, KY 40601

This 20<sup>th</sup> day of February, 2017.



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*Co-Counsel for Nolin RECC*