

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

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MAR 13 2017

In the Matter of:

CITY OF LIBERTY GAS COMPANY)

PUBLIC SERVICE
COMMISSION

ALLEGED FAILURE TO COMPLY WITH)
KRS 278.492 AND 49 C.F.R. PART 192)

CASE NO. 2017-00053

CITY OF LIBERTY'S MOTION TO RESCHEDULE THE HEARING

The City of Liberty, by counsel, hereby moves to reschedule the hearing currently set for April 5, 2017. In support of this motion, the City states as follows:

On February 6, 2017, the Public Service Commission issued an order establishing this case and ordering, *inter alia*, for the City of Liberty ("City" or "Liberty") to appear at a hearing on March 29, 2017. On March 7, 2017, the City requested an informal conference with Commission Staff and a continuance of the March 29 hearing. The City based its request for a continuance of the hearing in order to provide additional time to prepare for the hearing and to enable sufficient consideration of matters discussed at the proposed informal conference. On March 9, 2017, the Commission denied the City's request for an informal conference with Commission Staff but granted the City's motion to continue the hearing, which was rescheduled for April 5, 2017.

One of the City's primary witnesses, Bridgett Blake, is unavailable during the week of April 5, 2017, as she will be out of state on a previously scheduled vacation. Blake has information related to this matter and provided responses in the companion case docketed as Case No. 2016-00361. She will testify to various aspects of the City's governmental operations

in general and its natural-gas operations specifically. Blake will also testify as to the steps Liberty has taken to achieve compliance since being notified of a deficiency. The City believes that no other person will be in a better position to testify on certain matters related to this case.

Because Blake will be unavailable for the hearing on April 5, 2017, the City respectfully requests that the hearing in this matter be rescheduled. As an alternative date, the City is willing to participate in a hearing on the originally scheduled date of March 29, 2017. Because the Commission has denied the City's request for an informal conference, there fewer reasons to continue the date of the originally scheduled hearing. If the hearing is reset for March 29, the City respectfully requests that it be permitted to file witness and exhibit lists on or before March 22 (instead of March 20) in order to provide sufficient time to organize and prepare information and materials.

Respectfully submitted,



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