



ATTORNEYS AT LAW | PLLC

Mark David Goss
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June 19, 2017

VIA HAND DELIVERY

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

RECEIVED

JUN 19 2017

PUBLIC SERVICE
COMMISSION

Re: IN THE MATTER OF APPLICATION OF BIG SANDY RURAL ELECTRIC
COOPERATIVE CORPORATION FOR AN INCREASE IN RETAIL RATES
Case No. 2017-00171

Dr. Mathews:

Please find enclosed and accept for filing in the above-styled matter an original and ten (10) copies of a *Notice of Entry of Appearance* of Goss Samford, PLLC, on behalf of Big Sandy Rural Electric Cooperative Corporation ("Big Sandy"). Please also find enclosed and accept for filing on behalf of Big Sandy an original and ten (10) copies of a Motion for an Extension of Time to Respond to Deficiency Letter. Please return file-stamped copies of each of these submissions to me.

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

Respectfully,

A handwritten signature in blue ink, appearing to read "Mark David Goss".

Mark David Goss

Enclosures

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

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JUN 19 2017

IN THE MATTER OF:

**APPLICATION OF BIG SANDY RURAL
ELECTRIC COOPERATIVE CORPORATION
FOR AN INCREASE IN RETAIL RATES**

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CASE NO. 2017-00171

**PUBLIC SERVICE
COMMISSION**

NOTICE OF ENTRY OF APPEARANCE

Come now Mark David Goss and M. Evan Buckley, of the law firm Goss Samford, PLLC, and do hereby give notice of their entry of appearance as counsel of record for Big Sandy Rural Electric Cooperative Corporation ("Big Sandy RECC") in the above-styled matter. Mr. Goss and Mr. Buckley will be co-counsel with Hon. Lance Daniels, who is already counsel of record for Big Sandy RECC.

Undersigned counsel respectfully requests that future electronic documents issued by the Commission be served upon counsel at the electronic mail addresses listed below. Undersigned counsel also respectfully requests that all documents filed by parties to this case be served upon counsel in accordance with 807 KAR 5:001, Section 4(8)(d).

Dated this 19th day of June, 2017.

Respectfully submitted,



Mark David Goss
M. Evan Buckley
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ebuckley@gosssamfordlaw.com
Co-Counsel for Big Sandy 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 electronically served upon the following:

Hon. Kent A. Chandler
Hon. Rebecca W. Goodman
Hon. Justin McNeil
Kent.Chandler@ky.gov
Rebecca.Goodman@ky.gov
Justin.McNeil@ky.gov

This 19th day of June, 2017.



Co-Counsel for Big Sandy RECC

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

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**PUBLIC SERVICE
COMMISSION**

IN THE MATTER OF:

**APPLICATION OF BIG SANDY RURAL
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CASE NO. 2017-00171

**MOTION FOR EXTENSION OF TIME
TO RESPOND TO DEFICIENCY LETTER**

Comes now Big Sandy Rural Electric Cooperative Corporation ("Big Sandy"), by and through counsel, and hereby respectfully moves the Commission for an Order extending the deadline by which Big Sandy must file its response to the letter of deficiencies filed of record in this case by Commission Staff on June 8, 2017 (the "Deficiency Letter"). Specifically, Big Sandy requests that it be allowed an additional four (4) days (*to wit*, through Friday, June 23, 2017) to compile and articulate an appropriate response.

In support of this Motion, Big Sandy states that it is in the process of re-reviewing its Application and, in particular, the issues identified by Commission Staff in the Deficiency Letter and during the telephonic Informal Conference held earlier today, June 19, 2017. The extension of time is needed to avoid significant disruption of Big Sandy's operations and ensure all issues are appropriately addressed. Finally, the requested extension is reasonable and will not result in prejudice or undue delay.

WHEREFORE, for good cause shown, Big Sandy respectfully requests an Order from the Commission extending to June 23, 2017, the deadline by which Big Sandy must file its response to the Deficiency Letter.

Dated this 19th day of June, 2017.

Respectfully submitted,



Mark David Goss
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Co-Counsel for Big Sandy 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 electronically served upon the following:

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This 19th day of June, 2017.



Co-Counsel for Big Sandy RECC