

David S. Samford david@gosssamfordlaw.com (859) 368-7740

June 12, 2018

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PUBLIC SERVICE COMMISSION

VIA HAND DELIVERY

Gwen R. Pinson, Executive Director Kentucky Public Service Commission 211 Sower Boulevard Frankfort, KY 40602

Re: IN THE MATTER OF: APPLICATION OF INTER-COUNTY ENERGY COOPERATIVE CORPORATION FOR A GENERAL ADJUSTMENT OF EXISTING RATES - Case No. 2018-00129

Ms. Pinson:

Please find enclosed and accept for filing in the above-styled matter an original and ten (10) copies of Inter-County Energy Cooperative Corporation's Motion for an Extension of Time. Please return a file-stamped copy to me.

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

Respectfully submitted,

David S. Samford

Enclosures

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF INTER-COUNTY ENERGY COOPERATIVE CORPORATION FOR A GENERAL ADJUSTMENT OF EXISTING RATES

,

) Case No. 2018-00129

MOTION FOR AN EXTENSION OF TIME

Comes now Inter-County Energy Cooperative Corporation ("Inter-County"), by counsel, and hereby moves the Commission for an Order extending the deadline by which Inter-County must file its Response to Commission Staff's First Request for Information propounded in the above-styled matter on May 4, 2018. Specifically, Inter-County requests that it be allowed an additional seven (7) days, until Tuesday, June 19, 2018 to file its Responses.

In support of this Motion, Inter-County states that additional time is sought in order to adequately review, compile and confirm the extensive information and documentation requested by Commission Staff. While Inter-County has worked and is continuing to work diligently to respond to the Request in an expeditious manner, the detail and complexity of the information sought, coupled with the cooperative's minimal level of staffing, necessitates the relatively brief extension of time prayed for herein. Certain information requested by Commission Staff is not available in the formats requested. Therefore, Inter-County's consultant is having to manually input thousands of data entries. Inter-County believes its brief, requested extension is reasonable, will not result in undue delay, and is essential to ensure appropriate and adequate responses are thoroughly prepared and finalized.

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In further support of this motion Inter-County states that no time concerns nor other similar prejudice would result from this request since there are presently no intervenors in the case nor has a procedural schedule been entered by the Commission.

WHEREFORE, for good cause shown, Inter-County respectfully requests an Order from the Commission extending to Tuesday, June 19, 2018, the deadline by which Inter-County must file its Responses to Commission Staff's First Request for Information.

This 12th day of June, 2018.

Respectfully submitted,

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Counsel for Inter-County Energy Cooperative Corporation