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PUBLIC SERVICE COMMISSION

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

July 11, 2019

VIA HAND DELIVERY

Ms. Gwyn Pinson Executive Director Kentucky Public Service Commission 211 Sower Boulevard Frankfort, KY 40601

RE: In the Matter of the Application of East Kentucky Power Cooperative, Inc. for an Order Approving the Establishment of Regulatory Assets for Present and Future Maintenance Expenses, Case No. 2019-00146

Dear Ms. Pinson:

Enclosed, please find an original and ten copies of a Motion for an Extension of Time, filed on behalf of East Kentucky Power Cooperative, Inc. in the above-referenced docket. Please return a file-stamped copy of this filing to my office.

Please let me know if you have any questions.

Sincerely,

David S. Samford

Enc.

cc: Kent Chandler (w/enclosure)
Larry Cook (w/enclosure)
Justin McNeil (w/enclosure)
Mike Kurtz (w/enclosure)
Jody Kyler Cohn (w/enclosure)

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#### COMMONWEALTH OF KENTUCKY

JUL 1-1 2019

BEFORE THE PUBLIC SERVICE COMMISSION

PUBLIC SERVICE

COMMISSION

IN THE MATTER OF:

THE APPLICATION OF EAST KENTUCKY	)	
POWER COOPERATIVE, INC. FOR AN	)	
ORDER APPROVINGTHE ESTABLISHMENT	)	CASE NO. 2019-00146
OF REGULATORY ASSETS FOR PRESENT	)	
AND FUTURE MAINTENANCE EXPENSES	)	

#### MOTION FOR AN EXTENSION OF TIME

Comes now East Kentucky Power Cooperative, Inc. ("EKPC"), by counsel, pursuant to 807 KAR 5:001, Section 5, and other applicable law, and does hereby request the Kentucky Public Service Commission ("Commission") to grant it an additional three (3) business days in which to file responses to information requests propounded by the Commission, Nucor Steel Gallatin ("Nucor") and the Office of the Attorney General ("Attorney General"), respectfully stating as follows:

EKPC filed its Application seeking authority to establish regulatory assets for certain minor property and maintenance expenses on May 13, 2019. Nucor and the Attorney General were subsequently granted leave to intervene. The first set of information requests were tendered by the Commission, Nucor and the Attorney General to EKPC on June 26<sup>th</sup> and 27<sup>th</sup>. Under the Commission's May 21, 2019 procedural schedule, responses from EKPC are due on or before Friday, July 12, 2019. EKPC has worked diligently to prepare responses to the information requests, but the unavailability of certain personnel coupled with other pressing obligations have made it impossible for EKPC to fully prepare the responses to all the information requests as of

this date. Accordingly, EKPC respectfully requests a brief extension of its deadline to tender responses until Wednesday, July 17, 2019 – which equates to a three (3) business day extension. EKPC believes it is possible that it may need less time in which to file its responses, but is requesting three (3) business days out of an abundance of caution.

EKPC does not believe this brief extension will negatively impact the existing procedural schedule, however, it is agreeable to amending the procedural schedule to allow the Commission Staff and intervenors a corresponding period of additional time to tender supplemental information requests, if any.

WHEREFORE, on the basis of the foregoing, EKPC respectfully requests the Commission to allow it three (3) additional business days to tender responses to the initial information requests from the Commission, Nucor and AG.

Done this 11<sup>th</sup> day of July, 2019.

Respectfully submitted,

David S. Samford

L. Allyson Honaker GOSS SAMFORD, PLLC

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Counsel for East Kentucky Power Cooperative, Inc.

### **CERTIFICATE OF SERVICE**

This is to certify that a true and correct copy of the foregoing was sent via U.S. Mail, postage pre-paid, and via email to the following individuals on this the 11<sup>th</sup> day of July, 2019:

Mr. Kent Chandler Mr. Larry Cook Mr. Justin McNeil Assistant Attorneys General 700 Capital Ave., Suite 20 Frankfort, KY 40601-8204

Mr. Mike Kurtz Ms. Jody Kyler Cohn Boehm, Kurtz & Lowry 36 East Seventh Street Cincinnati, OH 45202

Counsel for East Kentucky Power

Cooperative, Inc.