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COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

DEC 1 8 2019

PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF SALT RIVER ELECTRIC)	
COOPERATIVE CORPORATION FOR AN)	
ORDER ISSUING A CERTIFICATE OF PUBLIC)	CASE No.
CONVENIENCE AND NECESSITY TO)	2019-00399
CONSTRUCT AN ADVANCED METERING)	
INFRASTRUCTURE SYSTEM (AMI) PURSUANT)	
TO 807 KAR 5:001 AND KRS 278.020)	

ATTORNEY GENERAL'S MOTION TO AMEND PROCEDURAL SCHEDULE TO ALLOW FOR ADDITIONAL ROUND OF DISCOVERY

Comes now the Attorney General of the Commonwealth of Kentucky, by and through his Office of Rate Intervention, and hereby moves the Commission to amend the November 13, 2019 procedural schedule in this matter. In support of this motion, counsel states that the Attorney General has additional questions to pose based on the responses Salt River Electric Cooperative (Salt River) filed to the Commission's and the Attorney General's data requests. Furthermore, Salt River's application contains confidential materials which the Company has, to date, failed to provide to the Attorney General despite repeated attempts to obtain a confidentiality agreement with counsel for Salt River. The Attorney General may also have questions based on these confidential materials.

WHEREFORE, the Attorney General respectfully requests that the Commission grant his motion.

Respectfully submitted, DANIEL CAMERON ATTORNEY GENERAL

TATEL TO THE STATE OF THE STATE

LAWRENCE W. COOK
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Certificate of Service and Filing

Counsel certifies that an original and ten photocopies of the foregoing were served and filed by hand delivery to Ms. Gwen R. Pinson, Executive Director, Public Service Commission, 211 Sower Boulevard, Frankfort, Kentucky 40601; counsel further states that true and accurate copies of the foregoing were mailed via First Class U.S. Mail, postage pre-paid, to:

Tim J. Sharp Salt River Electric Cooperative Corp. 111 West Brashear Ave. P. O. Box 609 Bardstown, KY 40004

John Douglas Hubbard Jason P. Floyd Hubbard & Hubbard 117 E. Stephen Foster Ave. Bardstown, KY 40004

This 18th day of December, 2019.

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Assistant Attorney General