

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:)
)
APPLICATION OF JACKSON ENERGY) CASE NO. 2013-00219
COOPERATIVE CORPORATION FOR AN)
ADJUSTMENT OF RATES)
)

MOTION FOR LEAVE TO FILE RESPONSES
TO POST HEARING DATA REQUESTS OUT OF TIME

Comes now Jackson Energy Cooperative Corporation (“Jackson Energy”) by and through the undersigned counsel, and hereby moves the Kentucky Public Service Commission for an order granting it leave to file responses to the Commission’s post hearing data requests past the time in which such responses were due. As grounds for this motion, Jackson Energy states as follows:

On January 28, 2014, a hearing was held in this matter on Jackson Energy’s application for an adjustment of rates. At that hearing, testimony was taken from several witnesses. Certain data requests were made orally throughout the hearing by Commissioners and PSC staff. After the hearing concluded, staff and personnel of Jackson Energy discussed a due date for these post hearing data requests, and a time frame of one week was agreed upon, making responses to the data requests due by no later than February 4, 2014.

After conclusion of the hearing, Jackson Energy personnel began assimilating the information requested in the data requests, but it soon became clear that doing so would be quite time consuming. In particular, the data requested with respect to Jackson Energy’s pre-pay program constituted a voluminous amount of information that had to be assimilated in a way that

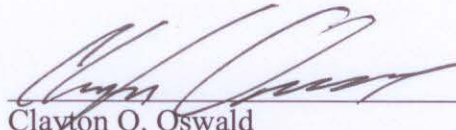
would be meaningful to the Commission, which was a task that Jackson Energy could not accomplish within one week of the hearing.

It should also be noted that while Jackson Energy stated at the hearing that its year end financials for 2013 would not be available for two weeks, Jackson Energy has been able to complete those reports and they are being filed along with all other responses to the post hearing data requests.

Jackson Energy is filing contemporaneously with this motion the full responses to the Commission's post hearing data requests.

Accordingly, Jackson Energy respectfully requests that the Commission enter an order granting Jackson Energy leave to file its responses to the Commission's post hearing data requests past the deadline which was stated at the public hearing of this matter.

Respectfully submitted by,



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