COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

An Examination Of By The Public Service)	
Commission Of The Environmental)	
Surcharge Mechanism Of Kentucky Power)	Case No. 2013-00325
Company For The Two-Year Billing Period)	
Ending June 30, 2013)	

Motion For A Seven-Day Enlargement Of Time Until November 1, 2013 To File Testimony And Responses To Information Requests

Kentucky Power Company moves the Commission pursuant to 807 KAR 5:001, Section 5 for an order enlarging the time by seven days until November 1, 2013 for the Company to file its testimony and responses to Staff's September 11, 2013 information requests.

- 1. By Order entered September 11, 2013 the Commission established a procedural schedule in this proceeding. Under that schedule the Company was required to file its prepared direct testimony and responses to information requests no later than October 4, 2013.
- 2. The Company subsequently determined that the PJM marginal losses and credits, congestion costs and credits, and financial transmission rights were misallocated between the Company's jurisdictional customers and off-system sales during the period July 2011 through June 2013. As a result, the Company's calculation of Kentucky jurisdictional revenues as a percentage of total revenues used in the calculation of the environmental surcharge was erroneous.

- 3. On September 27, 2013 Kentucky Power filed a motion to amend the September 11, 2013 procedural schedule by three weeks to provide sufficient time for the Company to review and confirm the revised allocations, to make and review the necessary re-calculations, and to prepare the testimony and information request responses
- 4. By Order entered October 3, 2013, the Commission granted the Company's motion and substituted the current procedural schedule. Under the current procedural schedule the Company is required to file its responses to Staff's September 11, 2013 information requests and the Company's testimony in this case on or before October 25, 2013.
- 5. On or about October 22, 2013 and October 25, 2013 the Company determined that its responses to the Staff's information requests and its prepared direct testimony to be filed on October 25, 2013 should be further reviewed and revised to reflect fully the adjustments to its monthly filings required to account for the year-end consumption adjustment of SO₂ allowances.
- 6. The Company believes that the requested seven-day enlargement until November 1, 2013 for it to make the necessary re-calculations and to file its prepared direct testimony and its responses to Staff's information request can be made without further changes to the October 3, 2013 procedural schedule. The Company has no objection to further amendment of the October 3, 2013 procedural to meet the needs of Staff or the Commission in light of the requested enlargement.

Wherefore, Kentucky Power Company respectfully requests that:

(1) October 3, 2013 procedural schedule in this case be modified to provide that Kentucky Power shall file its responses to Staff's September 11, 2013 information requests and the Company's prepared direct testimony in this case on or before November 1, 2013; and

(2) The Company be granted such further relief to which it may appear entitled.
 This 25th day of October, 2013.

Respectfully submitted,

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