

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

THE APPLICATION OF SHELBY ENERGY)
COOPERATIVE, INC. FOR AUTHORIZATION OF)
CHANGES IN SERVICE TERRITORY WITH KENTUCKY) NO. 2014-00224
UTILITIES COMPANY, SPECIFICALLY OLD MILL)
VILLAGE AND ROLLING RIDGE SUBDIVISIONS)

MOTION FOR EXTENSION OF TIME

Comes Shelby Energy Cooperative, Inc. ("Shelby Energy"), by counsel, and respectfully moves the Commission for an extension of time to file Shelby Energy's Responses to the Commission Staff's First Request for Information and Production of Documents to Shelby Energy Cooperative, Inc. As grounds for this request, Shelby Energy states that its response was ready to be filed on Monday September 15, 2014; however, prior to submitting that response, Shelby Energy made one last effort to locate the documents requested by the Commission. A copy of a map was located, which Shelby Energy believes is likely the October 18, 1988 agreement. A January 13, 1994 letter was also located which may be relevant.

In order to answer Question 2, Shelby Energy must review the Certified Territory Map for the Simpsonville Quadrangle referenced in the Commission's First Request. A request has been sent via email to PSC staff attorney Quang D. Nguyen requesting that a copy of that document be emailed so it can be compared to

the recently discovered map. Mr. Mguyen has indicated he is inquiring about the Simpsonville Quadrangle map.

WHEREFORE, for the foregoing reasons, Shelby Energy respectfully requests a 10-day extension of time to file its response to the Commission Staff's First Request for Information and Production of Documents to Shelby Energy Cooperative, Inc.

Respectfully submitted,



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