COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

In The Matter Of:

.

The Application Of Columbia Gas Of Kentucky,

Case No. 2016-00162

Inc. For An Adjustment Of Rates

:

KENTUCKY INDUSTRIAL UTILITY CUSTOMERS' MOTION FOR LEAVE TO FILE OUT-OF-TIME DATA RESPONSES

Kentucky Industrial Utility Customers ("KIUC") hereby moves the Kentucky Public Service Commission ("Commission") for an order granting KIUC leave to file out-of-time data responses to Commission's Staff's Initial Requests for Information filed September 16, 2016 in the above-captioned docket. A Memorandum in Support is below.

MEMORANDUM IN SUPPORT

On September 16, 2016, Columbia Gas of Kentucky, Inc. ("Columbia Gas") filed data requests directed at KIUC in the above-captioned docket, as did Commission Staff. However, due to the press of business, KIUC inadvertently missed the latter filing. KIUC submitted timely responses to the Columbia Gas data requests on September 30, 2016, but did not file responses to Staff's data requests. Shortly thereafter, KIUC was notified by Staff Counsel regarding its inadvertent error and acted quickly to correct it. KIUC now requests Commission leave to file its data responses to Staff (submitted herewith) out-of-time. Granting KIUC's request will bolster the record in this case and will not unduly prejudice

other parties since KIUC's responses are being filed only 2 business days after the Commission-established deadline and well before the November 1, 2016 hearing scheduled in this case.

Respectfully submitted,

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October 4, 2016