



the time period set by the current procedural schedule. Alternatively, the Intervenors will not object to a reasonable extension of time in which the Joint Applicants can respond to the request for information, nor will they request a corresponding adjustment to deadlines for issuance of supplemental data requests for such a reasonable extension.

Moreover, acceptance of this first set of requests for information will assist the Commission in presenting issues or developing facts in this matter. If these requests are not answered until the second round of data responses are provided, the Intervenors and Commission Staff may not have the ability to request any supplemental information on matters relevant to the standards set forth in KRS 278.020.

The Commission has previously granted similar motions for leave to file certain documents a few days after a deadline. See, e.g., Columbia Gas of Kentucky, Inc., Case No. 2016-00162 (Ky. PSC Oct. 7, 2016)(granting a similar motion after an intervenor inadvertently missed a filing deadline “due to the press of business” and quickly remedied the error); Louisville Gas & Electric Co., Case No. 2016-00383 (Ky. PSC Dec. 14, 2016). The Intervenors respectfully request that the Commission find good cause to accept this first set of requests for information.<sup>2</sup>

Respectfully submitted



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<sup>2</sup> The Intervenors acknowledge that this motion could become moot if the Commission ultimately denies their motion to intervene. See, e.g., Kentucky Utilities Co., Case No. 2016-00370 (Ky. PSC Feb. 1, 2017).

CERTIFICATE OF SERVICE

In accordance with 807 KAR 5:001, Section 8, I certify that the October 26, 2017, electronic filing of this Motion is a true and accurate copy of the same document being filed in paper medium; that the electronic filing will be transmitted to the Commission on October 26, 2017; that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding; and that an original paper medium of the Motion and six copies will be delivered to the Commission within two business days.



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