

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

Electronic Investigation of B & H Gas Company)
and Bud Rife, Individually and as an Officer of) **Case No. 2019-00055**
B & H Gas Company Alleged Violation of KRS 278.300)

MOTION FOR EXTENSION OF TIME

Comes B&H Gas Company and Bud Rife, Individually and as an Officer of B&H Gas Company (“Movants”), by counsel, and hereby move the Commission for extensions of time, as follows:

- a) a seven day extension, until April 4, 2019, within which to respond to the Commission Staff’s first data requests;
- b) a twenty one (21) day extension, until April 18, 2019, within which to respond to the Attorney General’s first data requests;
- c) a continuance of the hearing in this matter from April 24, 2019, until a day during the week of May 20, 2019, other than Friday, May 24, 2019.

As grounds for this motion, Movants state that it has been extremely difficult for the limited staff of B&H, consisting of Suda Allen, the office receptionist and bookkeeper, Robert Newsome, the part-time assistant, and Bud Rife, who has only been keeping limited hours at the direction of his doctor, to comply with the burdensome requests of the staff, and particularly the Attorney General. The Attorney General’s data requests consist of 58 distinct requests, with 163 distinct subparts to those requests. The amount of time necessary for what is essentially a two

person office, that is also charged with running a gas company, to accumulate the documents and formulate the responses to this burdensome request is staggering.

In addition, the Commission staff's data requests consist of 6 distinct data requests and 57 distinct subparts. Movants are committed to fully answering all of the requests of staff and the Attorney General, but need additional time to do so. Movants submit this is not an unreasonable request given the volume of material they must locate, sort and compile with a very limited staff.

Dated this 28th day of March, 2019.

Respectfully submitted,



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CERTIFICATE OF SERVICE

This is to certify that the foregoing copy of the MOTION FOR EXTENSION OF TIME is a true and accurate copy of the document being filed in paper medium; the electronic filing was transmitted to the Commission on March 28, 2019; there are currently no parties that the Commission has excused from participation by electronic means in this proceeding; and the filing in paper medium is being delivered to the Commission via U.S. mail.

A handwritten signature in blue ink, appearing to read "Joe F. Childers", is written above a horizontal line.

JOE F. CHILDERS