

**COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION**

*In the Matter of:*

<b>ELECTRONIC EMERGENCY DOCKET</b>	)	
<b>RELATED TO THE NOVEL</b>	)	<b>CASE NO. 2020-00085</b>
<b>CORONAVIRUS COVID-19</b>	)	

**MOTION FOR EXTENSION OF TIME**

Kentucky Association of Electric Cooperatives, Inc. (“Kentucky Electric Cooperatives”), by counsel and on behalf of the jurisdictional rural electric distribution cooperatives among its membership,<sup>1</sup> hereby respectfully requests an extension of time until February 10, 2021, to respond to Commission Staff’s Second Request for Information propounded in this matter on December 22, 2020.

Commission Staff’s Second Request for Information directs the cooperatives to provide updated information regarding “the percent of customers, by class, that pay on time for each month in 2020, including for the month of December.” This request is in follow-up to Commission Staff’s First Request for Information, Item 9, to which the cooperatives responded in July of 2020 with data then available. The updated information is requested by January 18, 2021.

In order to allow the cooperatives sufficient time to compile and submit complete and accurate information, the Kentucky Electric Cooperatives seek a short extension of the deadline by which responses must be provided. Though no two cooperatives’ billing cycles, systems, and

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<sup>1</sup> Namely, Big Sandy RECC; Blue Grass Energy Cooperative Corporation; Clark Energy Cooperative, Inc.; Cumberland Valley Electric, Inc.; Farmers RECC; Fleming-Mason Energy Cooperative; Grayson RECC; Inter-County Energy Cooperative Corporation; Jackson Energy Cooperative Corporation; Jackson Purchase Energy Corporation; Kenergy Corporation; Licking Valley RECC; Meade County RECC; Nolin RECC; Owen Electric Cooperative; Salt River Electric Cooperative Corporation; Shelby Energy Cooperative, Inc.; South Kentucky RECC; and Taylor County RECC.

processes are precisely the same, many (if not all) will be required to supplement any response filed by the existing deadline in order to provide complete data reflecting the year 2020, as requested, because the manner in which the cooperatives close their year-end books will mean that the requested December information will not be available until early February.

The extension of the deadline should permit each cooperative adequate time to ascertain and review the relevant information—particularly with respect to the month of December—and file that information in this docket. It does not appear any prejudice or undue delay will result from this extension of time, and having shown good cause, the Kentucky Electric Cooperatives respectfully request until February 10, 2021, to respond to Commission Staff’s Second Request for Information.

This the 4<sup>th</sup> day of January, 2021.

Respectfully submitted,

**DINSMORE & SHOHL LLP**

/s Edward T. Depp  
Edward T. Depp  
R. Brooks Herrick  
101 South Fifth Street, Suite 2500  
Louisville, KY 40202  
E-mail: [tip.depp@dinsmore.com](mailto:tip.depp@dinsmore.com)  
E-mail: [brooks.herrick@dinsmore.com](mailto:brooks.herrick@dinsmore.com)  
Phone: (502) 581-8000  
Fax: (502) 585-2207

M. Evan Buckley  
100 West Main Street, Suite 900  
Lexington, KY 40507  
E-mail: [evan.buckley@dinsmore.com](mailto:evan.buckley@dinsmore.com)  
Phone: (859) 425-1000  
Fax: (859) 425-1099

*Counsel to Kentucky Association of  
Electric Cooperatives, Inc.*

**CERTIFICATION**

I hereby certify that the electronic version of this filing made with the Commission on January 4, 2021, is a true and accurate copy of the paper document that will be submitted to the Commission within 30 days of the Governor lifting the state of the emergency pursuant to the Commission's Orders in this matter, and the electronic version of the filing has been transmitted to the Commission. A copy of this filing has been served electronically on all parties of record for whom an email address is given in the online Service List for this proceeding, and there are currently no parties that the Commission has excused from participation by electronic means.

/s Edward T. Depp \_\_\_\_\_  
*Counsel to Kentucky Association of  
Electric Cooperatives, Inc.*