COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC INVESTIGATION OF)	
INTERCONNECTION AND NET)	CASE NO. 2020-00302
METERING GUIDELINES)	

JOINT MOTION FOR AN EXTENSION OF TIME TO FILE BRIEF

Louisville Gas and Electric Company ("LG&E"), Kentucky Utilities Company ("KU"), Kentucky Power Company ("Kentucky Power"), and Duke Energy Kentucky, Inc. ("Duke Energy") (collectively, the "Joint Movants"), by counsel, hereby move the Public Service Commission ("Commission") to enter an order extending the deadline for all parties to file their briefs by 30 days. Pursuant to the Commission's Order dated February 16, 2021, briefs are due within 30 days from the date of the Order. As grounds for their Joint Motion, the Joint Movants state that the issues under consideration in this proceeding are complex and require careful analysis to brief properly, particularly with the addition of the impacts of FERC Order No. 2222 to this proceeding's scope. The Joint Movants therefore respectfully ask the Commission to extend the deadline by 30 days to allow all parties to provide briefs to the Commission that are thoroughly considered and most likely to be useful to the Commission.

The request for this brief extension of time will not prejudice the Commission or the parties in this proceeding and is not made for the purpose of delaying the Commission's investigation.

WHEREFORE, Louisville Gas and Electric Company, Kentucky Utilities Company, Kentucky Power Company, and Duke Energy Kentucky, Inc. respectfully request the Commission issue an order granting all parties an additional 30 days to file their briefs.

Respectfully submitted,

allyon & Strugeon

W. Duncan Crosby III
Stoll Keenon Ogden PLLC
500 West Jefferson Street, Suite 2000
Louisville, Kentucky 40202-2828
Phone: (502) 333-6000

Phone: (502) 333-6000 duncan.crosby@skofirm.com

Allyson K. Sturgeon
Managing Senior Counsel
Regulatory and Transactions
LG&E and KU Energy LLC
220 West Main Street
Louisville, Kentucky 40202
Phone: (502) 627-2088
allyson.sturgeon@lge-ku.com

Counsel for Louisville Gas and Electric Company

and Kentucky Utilities Company

Mark R. Overstreet Stites & Harbison PLLC 421 West Main Street Post Office Box 634 Frankfort, KY 40602-0634

Phone: (502) 223-3477 moverstreet@stites.com

Counsel for Kentucky Power Company

1s/ Rocco O. D'Ascenzo

Rocco O. D'Ascenzo (92796)
Deputy General Counsel
Duke Energy Business Services LLC
139 East Fourth Street, 1303 Main
Cincinnati, Ohio 45201-0960

Phone: (513) 287-4320 Fax: (513) 287-4385

E-mail: rocco.d'ascenzo@duke-energy.com

Counsel for Duke Energy Kentucky, Inc.

CERTIFICATE OF SERVICE

In accordance with 807 KAR 5:001 Section 8(7), this is to certify that Louisville Gas and Electric Company, Kentucky Utilities Company, Kentucky Power Company, and Duke Energy Kentucky, Inc.'s February 24, 2021 electronic filing is a true and accurate copy of the documents being filed in paper medium; that the electronic filing has been transmitted to the Commission on February 24, 2021; that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding; and that a true and correct copy in paper medium will be delivered to the Commission within 30 days of the lifting of the State of Emergency.

Nolin R.E.C.C. 411 Ring Road Elizabethtown, KY 42701-6767

Jackson Energy Cooperative Corporation 115 Jackson Energy Lane McKee, KY 40447

Inter-County Energy Cooperative Corp. 1009 Hustonville Road P.O. Box 87 Danville, KY 40423-0087

Duke Energy Kentucky, Inc. 139 E. Fourth Street Cincinnati, OH 45201

Farmers R.E.C.C. 504 S. Broadway P.O. Box 1298 Glasgow, KY 42141-1298

Jackson Purchase Energy Corporation 2900 Irvin Cobb Drive P.O. Box 4030 Paducah, KY 42002-4030

Salt River Electric Cooperative Corp. 111 W. Brashear Avenue P.O. Box 609 Bardstown, KY 40004 Big Sandy R.E.C.C. 504 11th Street Paintsville, KY 41240

Taylor County R.E.C.C. 625 W. Main Street P.O. Box 100 Campbellsville, KY 42719

Clark County Energy Cooperative, Inc. 2640 Ironworks Road P.O. Box 748 Winchester, KY 40392-0748

American Electric Power Service Corporation 1 Riverside Plaza, 29th Floor P.O. Box 16631 Columbus, OH 43216

Kentucky Resources Council, Inc. Attn: Tom FitzGerald, Counsel and Director P.O. Box 1070 Frankfort, KY 40602

Big Rivers Electric Corporation 201 Third Street P.O. Box 24 Henderson, KY 42420

Fleming-Mason Energy Cooperative, Inc. 1449 Elizaville Road P.O. Box 328 Flemingsburg, KY 41041 Kentucky Power Company 1645 Winchester Avenue Ashland, KY 41101

South Kentucky R.E.C.C. 200 Electric Avenue Somerset, KY 42501

Blue Grass Energy Cooperative Corp. 1201 Lexington Road P.O. Box 990 Nicholasville, KY 40340-0990

East Kentucky Power Cooperative, Inc. 4775 Lexington Road P.O. Box 707 Winchester, KY 4032-0707

Owen Electric Cooperative, Inc. 8205 Highway 127 North P.O. Box 400 Owenton, KY 40359

Grayson R.E.C.C. 109 Bagby Park Grayson, KY 41143

Michael L. Kurtz Kurt J. Boehm Jody Kyler Cohn Kentucky Industrial Utility Customers, Inc. c/o Boehm, Kurtz & Lowry 36 E. Seventh Street, Suite 1510 Cincinnati, OH 45202 Kenergy Corp. 6402 Old Corydon Road P.O. Box 18 Henderson, KY 42419

Meade County R.E.C.C. P.O. Box 489 Brandenburg, KY 40108-0489

Cumberland Valley Electric, Inc. Highway 25E P.O. Box 440 Gray, KY 40734

Licking Valley R.E.C.C. 271 Main Street P.O. Box 605 West Liberty, KY 41472

Shelby Energy Cooperative, Inc. 620 Old Finchville Road Shelbyville, KY 40065

Larry Cook
Angela M. Goad
John G. Horne II
J. Michael West
Office of the Kentucky Attorney General
Office of Rate Intervention
700 Capitol Avenue, Suite 20
Frankfort, KY 40601-8204

Kenya Stump Executive Director Energy and Environment Cabinet 2 Hudson Hollow Road Frankfort, KY 40601 Matt Partymiller President Kentucky Solar Industries Association, Inc. 1038 Brentwood Court, Suite B Lexington, KY 40511

Counsel for Louisville Gas and Electric Company

and Kentucky Utilities Company

Counsel for Kentucky Power Company

/s/ Rocco O. D'Ascenzo

Counsel for Duke Energy Kentucky, Inc.