

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

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

JOINT MOTION FOR AN EXTENSION OF TIME TO FILE BRIEF

Comes now East Kentucky Power Cooperative, Inc. (“EKPC”) and its sixteen Owner-Member cooperatives, (“Joint Movants”), by and through the undersigned counsel, and hereby moves the Public Service Commission (“Commission”) to grant an extension for the filing of briefs for thirty (30) days. The Commission’s February 16, 2021 Order contained a deadline for briefs to be filed within thirty (30) days from the date of the Order. On February 24, 2021, Kentucky Utilities Company, Louisville Gas & Electric Company, Duke Energy Kentucky, Inc. and Kentucky Power Company filed a joint motion requesting an additional thirty (30) days in which to file briefs, citing the complexity of issues arising from FERC Order No. 2222 and the careful analysis needed to thoroughly brief the issue. While EKPC has already given significant attention to FERC Order No. 2222, and is likely to be differently situated than other utilities, it agrees that additional time would be beneficial to determine the relationship, if any, between FERC Order 2222 and net metering interconnections under Kentucky law. The Joint Movants therefore, respectfully ask the Commission to grant a thirty (30) day extension to allow sufficient time to analyze the issues and draft the briefs. EKPC does not have any proposal to change its net metering

rates pending, nor does it plan to file such a proposal in the short term. Accordingly, an extension would not prejudice any party to this proceeding.

WHEREFORE, EKPC and its sixteen member cooperatives respectfully request the Commission issue an Order granting an additional thirty (30) days to file the briefs.

Done this 1st day of March, 2021.

Respectfully submitted,



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CERTIFICATE OF SERVICE

This is to certify that the foregoing electronic filing is a true and accurate copy of the documents being filed in paper medium; that the electronic filing was transmitted to the Commission on March 1, 2021; that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding; and that a copy of the filing in paper medium paper copies of this information will be hand-delivered to the Commission within thirty (30) days of the lifting of the present State of Emergency relating to the COVID-19 pandemic.



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