

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

In the Matter of:

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

**MOTION FOR AN EXTENSION OF TIME TO FILE BRIEF ON BEHALF OF
BIG RIVERS ELECTRIC CORPORATION AND ITS THREE MEMBER
DISTRIBUTION COOPERATIVES**

Comes Big Rivers Electric Corporation (“*Big Rivers*”), by counsel, and on behalf of itself and its three member distribution cooperatives, Jackson Purchase Energy Corporation (“*JPEC*”), Kenergy Corp. (“*Kenergy*”), and Meade County Rural Electric Cooperative Corporation (“*MCRECC*”) (collectively, the “*Members*”) hereby moves the Public Service Commission (the “*Commission*”) to enter an order granting a thirty (30) day extension for the filing of briefs. Pursuant to an Order dated February 16, 2021, the Commission requested, within thirty (30) days from the date of the Order, “a written brief discussing current and reasonably anticipated issues and concerns identified by each party regarding net metering guidelines, and, separately, current and reasonably anticipated concerns regarding Federal Regulatory Energy Commission (FERC) Order No. 2222.” The briefs, therefore, are currently due March 18, 2021.

As grounds for this Motion, Big Rivers and the Members echo the sentiments raised in similar motions filed jointly by LG&E, KU, Kentucky Power, and Duke, as well as EKPC and its member cooperatives. The issues before the Commission are complex, especially considering the potential relation and impact of FERC Order

No. 2222, a nearly 300-page order. Accordingly, Big Rivers and the Members respectfully request a thirty (30) day extension for all parties from the initial deadline for briefs in an effort to better consider the breadth of issues as they might relate the particular circumstances of Big Rivers and its Members, and to provide the Commission with thoroughly-considered feedback for its investigation. This request will not prejudice the Commission or other parties to this proceeding.

WHEREFORE, Big Rivers Electric Corporation, on behalf of itself and its Members, requests the Commission to issue an Order granting an additional thirty (30) days to file briefs.

On this the 2nd day of March, 2021.

Respectfully submitted,

/s/ Tyson Kamuf

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